



P.O.BOX 1386, HOUSTON, TEXAS 77251-1386 | 713.802.5000 | WWW.TXDOT.GOV

June 15, 2021

Mr. Craig Raborn, AICP  
Director, Transportation Planning  
Houston-Galveston Area Council (H-GAC)  
3555 Timmons Lane, Suite 120  
Houston, Texas 77027

**RE: Comments on Proposed Amendments to the 2045 Regional Transportation Plan (RTP)**

Dear Mr. Raborn:

This letter is in response LINK Houston's April 28, 2021, correspondence regarding comments on the Houston-Galveston Area Council's (H-GAC) 2045 Regional Transportation Plan (RTP) Amendments. The Texas Department of Transportation (TXDOT) will address LINK Houston's comments regarding TXDOT's project development process and then we will address the specific projects identified in the LINK Houston letter.

TXDOT has a long-standing history of providing a robust and equitable transportation system that has served as the State's transportation backbone providing critical access to opportunities and facilitating job creation and economic prosperity. The system is extremely efficient. The State system represents 26 percent of the public roads in Texas and, yet, it carries 72 percent of the vehicle miles traveled.

The Houston region is a microcosm of the State. As the fourth (4) largest City in the nation, Houston and the surrounding region can credit the historical collaboration and cooperation of regional leadership for having had the vision to make the tough decisions and investments needed to bring us to today's regional transportation network. The TXDOT Houston District has not wavered from its commitment to this collaboration and cooperation, but we do not serve one (1) constituency more ardently than any other. Our primary concern is safely moving people and goods in the entire region and beyond.

The TXDOT Houston District strives for excellence on every project and to serve equally the nearly seven (7) million regional residents – from those in the dense, urban core of Harris County to those in rural areas of Brazoria, Chambers, Fort Bend, Galveston, Liberty, Montgomery, and Waller Counties. We are especially concerned about those that are most vulnerable.

To accomplish TXDOT's mission, we use some of the most rigorous industry methods to develop our portfolio of projects and to move those projects through project development toward implementation. To that end, the Planning and Environmental Linkage (PEL) Study process, as suggested by LINK Houston, is not the appropriate process to use on most projects. The PEL process is designed to accelerate project delivery by integrating the planning and environmental process with implementation occurring, generally, within five (5) years. While TXDOT is certainly able to perform PEL studies, financial resources cannot keep pace with the potential portfolio of construction projects that would result from the PEL process. In other words, the PEL is not a tool to determine whether a project should be in the RTP, it's a tool for accelerated implementation.

OUR VALUES: *People • Accountability • Trust • Honesty*

OUR MISSION: *Connecting You With Texas*

An Equal Opportunity Employer

There are, however, many scientific methods TXDOT uses and studies performed to make decisions about the need for investment and to determine the types of improvements that are required to meet public needs. Our improvements follow industry-standard, federal, and state guidelines for engineering analysis and always consider environmental impacts. Whatever study method is employed, every project goes through the National Environmental Policy Act (NEPA) clearance process and TXDOT's major projects also go through stakeholder engagement and the public involvement process. In general, major projects are those other than routine maintenance, bridge replacements and certain safety improvements.

TXDOT's stakeholder and public engagement process is second to none in the Houston region. No other local government or transportation agency goes through the extensive and rigorous project level public involvement that TXDOT does. In fact, we would recommend as a best practice that other agencies implement our high standard of public engagement. TXDOT's level of engagement is appropriate given the diversity of use and volume of vehicles we accommodate within the region including Single Occupied Vehicles (SOV), carpools, vanpools, busses, and freight haulers. TXDOT is not focused on one (1) mode choice over the other. That is not our mission. TXDOT moves people and goods across a ground transportation system in whatever mode choice the user decides is appropriate.

With that said, TXDOT does want to move people as efficiently as possible across our system, and so we have invested in projects that help users do just that. TXDOT's Houston ConnectSmart Project seeks to level out the Bell Curve of congestion over time, space and ultimately mode in the eight (8) county region. We want to make Houston more connected and less congested. By providing users with information and better travel options such as carpool, vanpool and bus options that are personalized and tailored to the individual and rewarding them for their congestion-relieving decisions, TXDOT believes users are empowered to help us achieve our Visions Zero goal and ultimately will reduce vehicle miles traveled and improve our region's air quality and these choices will be made while riding on some of the safest and most comfortable facilities in the region. Cleaner air and improved safety require a comprehensive approach of engineering and technology solutions to get TXDOT where we want to be with respect to safety and climate. We are committed.

The Regional Express Access Lanes (REAL) concept is a response to the work performed by H-GAC's High Capacity Transit Task Force (HCTTF) in 2019, which developed a recommended network of high capacity transit facilities that largely proposed following the State system. The transit recommendations from this effort included multiple Bus Rapid Transit (BRT), Light Rail, and Commuter Rail lines. The task force's recommendation, developed over seven (7) task force meetings, were subsequently integrated into the 2045 RTP. No full suite of alternatives, qualitative or quantitative process involving data collection and analyses, universe of alternatives, or thorough process for community engagement was performed prior to including these impactful and potentially disrupting technologies into the 2045 RTP, other than the federally required, standard public meeting process for the long-range plan document.

The HCTTF recommendations, and the subsequent inclusion of those recommendations in the 2045 RTP, spurred TxDOT's interest to better understand the impacts of these technologies on the State system. The REAL Plan is a proposed comprehensive and forward-looking plan that seeks to understand how the State system can maximize the movement of people and goods in a highly efficient and agile manner. We are in Phase 1 of The REAL Plan, which includes coming together with our regional transportation partners to make data-driven decisions that are both quantitative and qualitative.

While the State system does support most vehicle miles traveled, the State system does not operate in a vacuum. The Region's ground transportation system functions as a hierarchy. Local streets feed into collectors, collectors feed into arterials and so on leading up to Interstates. A person using this network cannot get from home to their destination without using this integrated transportation network governed by multiple jurisdictions. TxDOT believes a coordinated REAL Plan vision is essential before introducing the concept to the public. To do anything else would compromise the cooperative process between the transportation partners and their respective transportation networks.

Phase 1 of The REAL Plan is the start of a conversation that TxDOT hopes will still be discussed 20 years from now as the REAL Plan goes from concept to phased implementation as needs, resources and new technologies are identified. TxDOT hopes in Phase 2 that H-GAC, with the transportation partners commitment toward a shared vision for the future of transportation in the region, will take The REAL Plan to the next step – the public and ultimately formalize The REAL Plan vision into the region's long-range plan. The TxDOT system is one part of The REAL Plan vision, albeit a critical part since the State's system serves as the transportation backbone moving people and goods in the region.

Further, TxDOT has no preconceived ideas of a REAL Plan network being a series of "interconnected elevated express lanes". Each corridor requires an independent and deeper data-driven analysis that includes the REAL Plan framework and goals collectively agreed upon by the regional transportation partners to ensure an integrated system that provides equitable services from the first mile to the last mile of a person's trip. This independent, corridor level study will collect the specific data and land use information required to determine the needs within that specific corridor. These corridor level studies will include extensive stakeholder engagement and public involvement. That is TxDOT's process.

Some of these major studies being proposed by TxDOT in the 2045 RTP Amendment may be utilizing concepts from the REAL Plan vision that is, admittedly, still in Phase 1. However, each of these corridor studies can function independently, absent a REAL Plan vision because they are being evaluated based on corridor-specific data and needs augmented with public and stakeholder input. The REAL Plan vision does propose an integrated transportation network that is accessed through mobility hubs. Any recommended corridor improvements today should be agile enough to meet a REAL Plan future.

In summary, TxDOT recommends the Transportation Policy Council (TPC) approve the 2045 RTP Amendments as submitted. This will enable us to work cooperatively and collaboratively to plan for the orderly growth and development of the ground transportation system and to foster increased economic vitality and enhanced access to opportunities through more efficient movement of people and goods in the 8-county region.

A final thought before we address the specific projects mentioned in LINK Houston's letter. TXDOT is unwavering in its commitment to provide high-quality, safe, multimodal transportation that is affordable and dignified. Our facilities are not limited to the SOV, any ground transportation mode can access our facilities subject to law. Further, the High Occupancy Vehicle (HOV) lanes incentivize sharing a ride by offering enhanced reliability and managed lanes penalize the SOV by charging a fee for use; although, most are not operated by TXDOT even though they are on the State system. Causing congestion by limiting improvements to the State system to spur behavior change toward higher occupancy commuting and transit ridership is not an acceptable solution. The improvements TXDOT provides are not only for capacity; our improvements increase safety and enhance the driving experience by creating a facility that operates more comfortably for all modes. H-GAC's long-range plan indicates the region's population will swell to nearly 11 million by 2045. It will take all of us working together to provide an integrated and robust ground transportation system that provides users options, so they can decide which mode meets their needs

TXDOT would like to address the specific project concerns outlined in LINK Houston's letter.

### Hempstead Road

Hempstead Road from I-610 to BW 8 currently exists in the 2045 RTP. This project will undergo a feasibility study to determine potential scope changes. The study has not commenced, but it will include significant stakeholder engagement and public involvement. As discussed earlier, TXDOT has been inspired by the work of the HCTTF and believes REAL Plan concepts are appropriate to explore in this corridor given its proximity and connection to the proposed high-speed rail project, the Galleria BRT, Northwest Transit Center, and a potential connection to the Inner Katy Corridor and the Central Business District. We look forward to working with all the stakeholders and the public to potentially refine the scope of this important project. All potential scope changes will reflect new technologies and use appropriate, available data.

### I-10 West from I-610 West to I-45 and I-10 West from Studemont to Houston Avenue

TXDOT is keenly aware of the time sensitivity of the Inner Katy BRT Project. The BRT Project was the top-ranking project during the 2018 H-GAC Call for Projects and currently is programmed in the H-GAC 2021-2024 Transportation Improvement Program (TIP) to let to construction January 2023. TXDOT will do everything possible to help the Metropolitan Transit Authority of Harris County (METRO) stay on their implementation timeframe.

The I-10 west (Inner Katy) Corridor is a high-volume facility in terms of passenger and freight movement with limited right of way (ROW) for future improvements. This section of roadway carries nearly 275,000 vehicles per day including SOV, carpools, vanpools, and buses. Nearly 8 percent of the corridor's traffic is freight. METRO's Inner Katy BRT Project will impact the State's ROW and the interstate facility.

The identification of existing and future transportation needs for the movement of people and goods within the I-10 Inner Katy Corridor is paramount to ensure TXDOT can adequately respond to METRO's inclusion of the proposed Inner Katy BRT currently programmed for construction in the H-GAC's TIP.

In short, TXDOT must better understand the physical space ramifications and other impacts these proposed improvements will have on the I-10 Inner Katy Corridor. The I-10 Inner Katy Corridor Study is a direct response to the Inner Katy BRT implementation project. Otherwise, TXDOT would be evaluating METRO's Inner Katy BRT project without the necessary information to make sound engineering decisions about the future of the corridor.

To TXDOT's knowledge, the METRO Inner Katy BRT Project does not have enough project level environmental or engineering detail to determine impacts to the human environment, our facility, or the surrounding natural and built environment. Because of the lack of basic project level information on these projects and the certain impact to our facility, TXDOT initiated the I-10 Inner Katy Study so that we could collaboratively develop a shared vision for the future of I-10 Inner Katy.

TXDOT acknowledges that in the days following the federal disaster declaration related to the COVID-19 pandemic, traffic volumes dropped substantially. Traffic volumes remained low in the following months. This is supported by the Regional Travel Impacts of COVID-19 report prepared by the H-GAC and presented at the May 21, 2021, TCP meeting. The report indicates that while traffic volumes initially dropped, the volumes have rebounded and as of "September 4, 2020, the Friday of Labor Day weekend, that travel volumes were equal to or greater than the baseline volume." The report goes on to say that travel volumes have hovered at approximately 80 percent of the pre-COVID volumes.

TXDOT's own data shows that traffic volumes are at or near pre-COVID volumes. The Governor has declared the State open and businesses are returning to normal, we anticipate higher traffic volumes as many individuals may shift from transit to SOV for personal health reasons. In addition, traffic patterns may have changed. For instance, there may be fewer people traveling from home to work during peak periods and more people may be running errands during the day. Nevertheless, the volumes have rebounded, therefore, telecommuting does not seem to have had a significant impact on the State's transportation system. TXDOT does suggest that H-GAC and/or METRO perform a new traffic analysis to reflect the effects of the COVID-19 pandemic and the resultant telecommuting/changes in travel patterns on transit ridership because the traditional morning/evening peak travel demand may have been impacted and thus, may impact current and proposed bus operations. This will ensure that investments being made to develop and implement these very impactful transit services will be using the latest post-pandemic assumptions and data.

TXDOT is committed to supporting the development and implementation of the proposed METRO Inner Katy BRT Project. To date, TXDOT and METRO have worked collaboratively and cooperatively to identify and share information for the benefit of the traveling public. We have successfully delivered a joint Virtual Public Meeting event for the Inner Katy Corridor that showcased the METRO Inner Katy BRT Project while also soliciting input concerning the existing and future transportation needs of the broader corridor. It is the identification of the needs and the discussion of potential solutions for which TXDOT is currently seeking an amendment to the 2045 RTP. Including the Inner Katy Corridor Study in the H-GAC long-range plan is the start of a conversation about the future of this vital corridor. TXDOT would not want the implementation schedule for METRO's Inner Katy Project to be adversely impacted if as requested by METRO, the TXDOT Inner Katy Project is not included in the 2045 RTP. Without inclusion of TXDOT's Inner Katy Project in the RTP, TXDOT will not be able to make sound engineering decisions about the future development of the corridor.

I-610 West from I-10 West to I-69 South

PENDING

SH 35 from Dixie Drive to Brazoria County Line

Improvements to SH 35 from Dixie Drive and continuing south past the Brazoria County (County) line to future SH 99 are needed to provide a critical connection for communities in the southern part of TXDOT Houston District's service area. As stated previously, we do not believe telecommuting to be a large factor in traffic volumes and we do not see where "significant work" has been performed in the corridor to determine that the focus of development for this corridor should be commuter rail. Furthermore, TXDOT would not be the implementing agencies for commuter rail. Commuter rail planning, design, and implementation would be performed by others.

TXDOT's process for corridor studies involves both a quantitative and qualitative process that features extensive stakeholder and public engagement and input before finalizing a proposed improvement concept. We believe including the project in the 2045 RTP establishes meaning by public engagement by communicating TXDOT intends to study the corridor because this corridor is vital to the transportation system for the cities south of Houston. Improvements are anticipated to move people and goods more reliably.

Conclusion

TXDOT is unwavering in its commitment to continually work with regional transportation partners and the nearly 7 million constituents in the Houston-Galveston-Brazoria-Woodlands-Conroe Transportation Management Area to ensure they all have a voice in the State planning process. This continuous cooperation and collaboration are fundamental to achieving the region's mission of improving transportation, promoting smart growth, protecting the environment, enhancing the economy, and fostering equity.

In addition to this letter, we have provided specific responses to public comments as part of H-GAC's Response Matrix for the 2045 RTP Amendments. Thank you for the opportunity to respond. Should you have any questions please contact my office at (713) 802-5001 or via email at [eliza.paul@txdot.gov](mailto:eliza.paul@txdot.gov).

Sincerely,



Eliza C. Paul P.E.  
District Engineer  
Houston District

Attachment

Mr. Craig Raborn

7

June 15, 2021

**CC:** James W. Koch, P.E., Director, Transportation Planning and Development,  
Houston District, TXDOT  
Andrew C. Mao, P. E., Director, Advanced Transportation Planning, Houston District, TXDOT  
Vishu Lingala, H-GAC  
Oni K. Blair, Executive Director, LINK Houston

OUR VALUES: *People • Accountability • Trust • Honesty*  
OUR MISSION: *Connecting You With Texas*

An Equal Opportunity Employer

April 28, 2021

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

**BOARD OF DIRECTORS**

Amanda Timm  
Chair

Bill Fulton  
Vice Chair

Adrienne Mangual  
Treasurer

Elizabeth Love  
Secretary

Richard Petty  
Immediate Past  
President

Dr. Denaë King

Janis Scott

Michael Skelly

Berenice Yu

James Llamas

Toby Cole

Oni K. Blair

**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."

## BOARD OF DIRECTORS

Amanda Timm  
Chair

Bill Fulton  
Vice Chair

Adrienne Mangual  
Treasurer

Elizabeth Love  
Secretary

Richard Petty  
Immediate Past  
President

Dr. Denaë King

Janis Scott

Michael Skelly

Berenice Yu

James Llamas

Toby Cole

Oni K. Blair

**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."**



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.

## BOARD OF DIRECTORS

Amanda Timm  
Chair

Bill Fulton  
Vice Chair

Adrienne Mangual  
Treasurer

Elizabeth Love  
Secretary

Richard Petty  
Immediate Past  
President

Dr. Denaë King

Janis Scott

Michael Skelly

Berenice Yu

James Llamas

Toby Cole

Oni K. Blair

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.**

---

### 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."

---

### 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.



---

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

*Proposed Amendment: Construct 4 express lanes.*

### BOARD OF DIRECTORS

Amanda Timm  
Chair

Bill Fulton  
Vice Chair

Adrienne Mangual  
Treasurer

Elizabeth Love  
Secretary

Richard Petty  
Immediate Past  
President

Dr. Denae King

Janis Scott

Michael Skelly

Berenice Yu

James Llamas

Toby Cole

Oni K. Blair

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

---

## 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.*

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

***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.***

***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.***

---

## SH 35 from Dixie Drive to Brazoria County Line

*Proposed Amendment: Construct new 6 lane freeway with 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.

