

LINK HOUSTON

April 30, 2019

Mr. Alan Clark
Director of Transportation Planning
Houston-Galveston Area Council
P.O. Box 22777, Houston, Texas 77227
Submitted by email to publiccomments@h-gac.com

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RE: Draft 2045 REGIONAL TRANSPORTATION PLAN, April 2019

Dear Mr. Clark,

The following are LINK Houston's comments regarding Houston-Galveston Area Council's (H-GAC) draft of the 2045 Regional Transportation Plan (RTP) and Air Quality Conformity Documents. LINK Houston advocates for a robust and equitable transportation network so that all people can reach opportunity. The paradigm by which our region provides mobility in the near and long-term future will have a profound impact on community quality-of-life and influence people's ability and choice to affordably and safely access the rich opportunities our region offers by walking, biking, rolling, and riding public transit (e.g., bus, rail, vanpool, paratransit).

LINK Houston proffers concise comments regarding several elements of the draft RTP and appendices. We have organized our comments following the organization of the plan to assist H-GAC in incorporating our comments into the final plan.

Ch 1. Introduction

No specific discussion or comments.

Ch 2. Vision, Goal, Strategies, and Performance Measures

The vision and goals are acceptable. The strategies [manage, maintain, expand] are an adequate framework for categorizing projects. We are pleased that the safety goal's performance measures include reducing motor vehicle crashes involving people walking and biking.

1. Table 2-7 Major Added Capacity Improvements could leave the reader with a misunderstanding about how the regional plan expands transportation options. Meaning, the present tables note three highway projects costing less than \$1bn and lists three items costing more than \$1bn line for non-highway investments in local thoroughfares, transit, and walk/bike infrastructure. We strongly support the investments in local streets, transit, and walk/bike/roll. However, the paragraph following the table, at the top of page 2-10, lists several major highway and tollway projects that will also be constructed and that are not listed in Table 2-7. We suggest including several of the larger highway/tollway projects in Table 2-7 to more accurately reflect how the regional policy council is planning to expend resources to expand roadways as well. Having a complete picture of how investments are proposed to be made in the future will help the public and decision-makers to collaborate. This information may be further in the plan, but many people will primarily see only the higher-level summary.



Ch 3. Existing Infrastructure, Challenges and Issues

While H-GAC may not have considered LINK Houston a formal member of the High Capacity Transit Task Force (we did not exist when it was formed), we actively participated in the effort from our earliest days as an organization. H-GAC staff, specifically Thomas Gray, did an admirable job. Staff showed a willingness to temper model inputs and outputs per task force direction and based on community identified needs. This was best exemplified in how the transit Priority Network map was iterated to include more services on the east side of Houston and the eight-county region. We appreciate that the Priority Network map is included in several sections of the plan body and has its own appendix.

2. The challenges listed under active transportation, page 3-13, could include a statement about improving universal accessibility to enable people with a disability to access existing and new sidewalks to get places safely. Several cities and Houston METRO are working to improve accessibility as a recognized challenge due to historical development standards, aging infrastructure, and our aging population.
3. The Houston region's three 500-year rain events in as many years have revealed our extensive vulnerability, not to mention areas that routinely flood due to historical issues with infrastructure and water flow (e.g., Independence Heights in Houston). We strongly support H-GAC's continuing to investigate how to proactively exceed federal minimum requirements when it comes to flood resilience. City of Houston and Harris County have taken a lead by requiring new development to be 2' above 500-year event levels. H-GAC can conduct analysis and foster dialogue about mitigating our vulnerabilities regionally.
4. The performance target numbers for safety, page 3-29, point to Appendix P FAST Act Compliance and not Appendix E Regional Safety Plan. There should be more discussion about the regional safety plan's role in regard to the RTP and how the federally required performance measures differ from our local region's aspirations, as Allan Clark aptly described in several H-GAC settings. We suggest H-GAC also incorporate some brief overview of how the region is doing in regard to safety (the "why" for safety).
5. Our last suggestion is to edit Table 3-4 to explain what the rate of fatalities/injuries is based on, population(?) or vehicles miles traveled(?).

Ch 4. Regional Growth

The region's population will continue to grow, but where and how people will travel is a chicken and egg situation. Suburban development is exceptionally expensive to provide transportation access and results in very levels of single occupant vehicles trips. Does suburban development occur first and then transportation infrastructure is pressured to "catch-up?" Or, do transportation planners presume massive suburban outward expansion and therefore plan expensive large-scale highway and tollway projects to accommodate said growth? The truth is not entirely one or the other. It is likely that the suburban land development would slow/diminish if it were known transportation investment would not follow and would come at immense public expense.

The alternative is for transportation planners to proactively design multi-modal networks with nodes that have gravity to naturally incentivize more concentrated land development conducive to multi-modal travel en-masse – transit-oriented development on regional and local scales served by high capacity transit, local transit networks, and complemented by 24/7 high-occupancy vehicle network for vanpools and carpools. We do not need more general-purpose main lanes. The economy and development patterns would naturally adjust. The economic pain from this paradigm shift would be felt primarily by land developers with long-term bets on suburban sprawl wealth facilitated by public expenditure on highways for solo drivers.

This discussion is related to congestion, which is not to be hated. Freight and commercial traffic must have a way to reliably move goods and support jobs – yes – but the best way to achieve that is not solely through expanded highways. Personal travelers experiencing congestion while driving alone during peak periods is desirable because they are part of the problem. Congestion is a naturally occurring "cost" for urban areas and not entirely undesirable. The principles of latent demand and induced demand guarantee that we cannot build our way out of congestion, ever, in any scenario, likely on any corridor (IH-10 Katy Freeway was massively expanded to solve congestion and is more congested than IH-45 North, see Table 3-1). Congestion is motivation to diversify the mobility system.



Congestion is motivation to allow land use changes to occur, which can include a variety of tools by public stakeholders to preserve/promote affordable housing near education and job opportunities.

These are longer-term paradigm points that perhaps H-GAC cannot address in editing the draft RTP. We understand. We provide them for general awareness and as sound observations about how regional transportation planning occurs in a complex policy and economic environment. We support accommodating the growth documented in Chapter 4 Regional Growth but assert that different policy decisions can be made to more proactively influence where people live and how they travel in the greater Houston region.

6. H-GAC should add a figure 4-16 with a map of peak congestion with the HCT Vision Network OR (if that is not feasible) a map of peak congestion with the HCT Priority Network and roadway capacity improvements. This will ensure the HCT's work and the Priority Network are addressed in the regional growth chapter. Additional dialogue to discuss the HCT and the additional figure should be added. High capacity transit investments are key to sustainably managing growth and should be a highlight of Chapter 4's conclusion.

Ch 5. Recommendations and Fiscal Constraint

No specific discussion or comments.

Ch 6. Transportation Conformity (Air Quality)

LINK Houston defers to other stakeholders with expertise in air quality conformity for detailed comments.

7. Clean air is critical to health, especially for children and older adults. We suggest that the front matter for Chapter 6 incorporate some brief discussion about how conformity is about regional air quality compliance and does not guarantee local air quality in particular locations or communities. Why? The practice for modeling conformity is important but does not evaluate localized impacts of even major transportation projects. For example, the North Houston Highway Improvement Project draft EIS found the proposed project was conforming – at a regional level – but did not provide any detailed information about localized air conditions long-term in proximity to the project. We have shared this concern with the Texas Department of Transportation as an actively engaged stakeholder. We mention it here only as an example. H-GAC should incorporate a paragraph to explain that conformity of particular projects does not preclude positive and negative air quality changes in communities in proximity to major transportation projects.

Ch 7. Public Involvement

H-GAC conducted an adequate amount of public outreach throughout the planning process, most especially during the early stages of planning to solicit public opinion.

8. Figure 7-1 does not have the percentage for sidewalks/pedestrian infrastructure. Figure 7-1 lists commuter options twice, once with 7% and the other with 9%. Please check this figure to ensure the top ten priorities are correctly reflected.

Appendix H. Draft Regional Active Transportation Plan

LINK Houston was not a formal member of Pedestrian/Bicyclist Subcommittee during the development of the Regional Active Transportation plan. (We did not exist when the working group formed.) We were active participants in the process these past months and now do sit on the subcommittee. We support the plan as drafted. H-GAC staff and the working group did an admirable job analyzing where need exists in the region and establishing a framework by which to prioritize, or spur, investment.

Appendix I. Environmental Justice

This is an exhaustive and well-constructed report looking at the region with a Title IV environmental justice lens.



9. H-GAC should incorporate portions of this appendix into Chapter 3 Existing Conditions and Chapter 4 Regional Growth. The added material can explain what environmental justice is and why it matters. In addition, we recommend that H-GAC summarize findings about the pattern of transportation investment choices (distributional equity), considerations of system performance and equity, accessibility to vital services, and safety. Noting potential challenges in Chapter 3 Existing Conditions discussion of environmental justice could include this quote from page ES 8, *“Transportation projects in the inner-city that significantly expand the existing right-of-way will inevitably result in disproportionately high and adverse impacts on the protected population. Displacing the underserved population from accessible locations and their removal to less accessible localities may introduce fresh hardships and severely impact the quality of life of the affected citizens.”*

Appendix J. Resiliency

This appendix was generated in fall 2017 in a timely fashion post Hurricane Harvey. That is to be applauded.

10. A revised version could be created in the future to incorporate additional information now available, such as from the Greater Houston Flood Mitigation Consortium. Also, a revised document could address an aspect of resilience not discussed previously. The present document focuses on the ability to access transportation arteries (primarily highways) during flood events, a prime concern for evacuation, emergency response, and recovery activities. The missing discussion is to identify where existing transportation infrastructure is already adversely impacting communities, such as by undersized water conveyance structures resulting in community flooding. Transportation provides access to communities but can also be part of the problem itself. The Houston region needs to move beyond concern about historical liability and focus on collaborative solutions to existing issues and proactive policy solutions for future infrastructure and communities. Anytime an agency touches a facility to reconstruct or significantly alter infrastructure they must concurrently correct existing issues – most especially with flooding.

Appendix L. Intercity Buses (Locations, Service Summary)

11. This appendix could use a substantial update in the future. There is some interesting information about the Charles Wilson VA Shuttle operated by Brazos Transit District. However, overall there is insufficient information about who operates intercity bus in the region and the present and possible role of such services. The region receives significant services by Greyhound, Vonlane, Megabus, and a variety of Spanish-speaking focused providers. Several of the intercity bus routes by Greyhound and Vonlane are commuter focused and may replace trips otherwise made by a single occupant driver.

Appendix M. Enhance Travel and Tourism

12. This appendix could also use a substantial update in the future. Figure 1 is of poor quality and does not note many important travel and tourism destinations important for out-of-region and local tourism. A more effective discussion would highlight how multi-modal transportation networks, especially in the future with walk/bike and transit investments, can improve access to tourist activity centers and remove the need to make the trip using a personal or rented vehicle. This is especially important as Houston seeks to host events attracting international visitors. It is also important for this section to note that many of the jobs supported by tourism are low to moderate wage jobs filled by persons in our region who need safe, affordable access to the job site during non-traditional work hours (often early morning, mid-day, or late evenings) and seven days a week.

Conclusion

LINK Houston provides these comments as a non-profit stakeholder and active participant in transportation processes in the region. We believe every major infrastructure project using taxpayer dollars is an opportunity to improve quality of life – most especially for the communities immediately impacted by the said project – much more than simply continuing status quo and mitigating negative impacts of projects in pursuit of benefits to other communities. Transportation infrastructure will continue to influence access to opportunity and quality of life, including health and wellness in Harris County and the eight-county region. We hope that as H-GAC continues to



plan for our region's future there is a continued commitment to planning for creative, innovative, safe, and multi-modal affordable transportation options.

Thank you for the opportunity to provide comments on the draft Regional Transportation Plan.

Sincerely,

A handwritten signature in black ink that reads "Jonathan P. Brooks". The signature is written in a cursive style with a large, stylized initial 'J'.

Jonathan P. Brooks

Director of Policy and Planning
LINK Houston

