



July 26, 2017

Quincy Allen, P.E.
Texas Department of Transportation, Houston District
P.O. Box 1386
Houston, Texas 77251

Re: North Houston Highway Improvement Project – DEIS Review

Dear Mr. Allen,

The following are the Houston Parks Board's [HPB] comments regarding the DEIS for TxDOT's North Houston Highway Improvement Project. Having participated in the scoping process and subsequent discussions on this project, HPB contends that the DEIS does not fully respond to the significant impacts on parks and open space created by the proposed project. In particular, the project significantly decreases greenspace along White Oak Bayou Greenway north of downtown and Little White Oak Bayou south of I-610. As a result, HPB requests that TxDOT prepare a Supplemental Environmental Impact Statement to more fully address those impacts and develop creative strategies to minimize and mitigate them with additional green space improvements along the corridor.

White Oak Bayou Greenway

The White Oak Bayou Greenway is part of Bayou Greenways 2020, a \$220 million public/private investment by the City of Houston to provide continuous linear parks, with hike/bike trails, along 150 miles of Houston's major waterways. The White Oak Bayou Greenway extends over 15 miles from the city limits to UH-Downtown where a federally funded TIGER project, currently under construction, is connecting White Oak Bayou Greenway to Buffalo Bayou Park. That TIGER project also includes neighborhood connections to Main Street and Leonel Castillo Community Center at Hogg Park, plus bike wayfinding to the transit centers on Fulton. It represents the kind of complete community effort that Houston is working toward and federal funding champions.

The 1,100 feet of White Oak Bayou Greenway from the current I-45 overpass at UH-Downtown west to Hogg Park is completely open to the sky and the bayou except for small under-crossings at the rail bridge and Hogan Street. The linear park features wildflowers and a hike-and-bike trail maintained by HPB. It offers amazing views of downtown. We are very concerned that the sense of open space will be negatively impacted by the North Houston Highway Improvement Project. The project will extend seven new highway overpasses over the greenway's widest stretch. Currently, only the existing I-45 overpass impacts the greenway, and because it sits right against the massive UH-Downtown building, it is more part of the urban infrastructure. The new overpasses will create an intrusion into the landscape. Moreover, additional lanes parallel to the bayou encroach further into the south side of the greenway to the point where they impose on the bayou itself.

The DEIS appears to suggest that if the project maintains just the hike-and-bike trail, no impact results. That ignores the impact to the greenway and open space itself of which the hike-and-bike trail is just a component. The project eliminates that open space. While the project will remove some freeway, HPB estimates a net increase of 18 acres of open space effectively covered by the project in just the stretch between UH Downtown and Hogg Park. The DEIS does not identify this as an impact, but it certainly is one, and the DEIS should offer alternatives or mitigation to minimize that impact.

Freed, Woodland and Other Parks

The DEIS identifies less than one acre of impact to City of Houston Parks. It dismisses that impact as related to marginal greenspace rather than the "use of facilities." HPB calculates the total loss of open space in City parks at 3.27 acres (table attached). Thus, as it does with the greenways, the DEIS dismisses the impact to green space and open space as non-existent if the project does not impact active features of the park. The greenspace impacted is the park and therefore should be recognized as such regarding mitigation.

Little White Oak Bayou Greenway

Through a study called Beyond the Bayous funded by the Houston Endowment, HPB has been actively identifying opportunities for expanded open space and hike-and-bike connectivity. In a sense, Beyond the Bayous is even more difficult than Bayou Greenways in that it seeks to retrofit the city around the existing connectivity barriers created by freeways, major arterials and railroads.

Little White Oak Bayou represents a prime opportunity to extend open space connectivity north from White Oak Bayou Greenway to Woodland and Moody Parks and beyond up to Halls Bayou. The 20 lanes at I-45 will eliminate 10 acres of open space along Little White Oak Bayou. We are currently in the process of expanding the Bayou Greenways network to include Little White Oak Bayou from I-10 to at least Crosstimbers with an extension to Acres Homes, an area of the city not currently served by trails. This connection would benefit many of the underserved communities directly impacted by the North Houston Highway Improvement Project. Through most of Segment 2, the project follows the course of the Little White Oak Bayou. An old TxDOT trail runs north from Moody Park along the bayou. We recommend the DEIS be supplemented with specific design features to preserve the ecological values and open space potential of Little White Oak Bayou including:

- a. Providing bridge spans and trail underpasses where I-45 crosses Little White Oak Bayou;
- b. Building a continuous shared-use trail from Woodland Park to Crosstimbers;
- c. Designing detention basins to be fully-functioning recreational green spaces along the greenway;
- d. Providing for a safe trail corridor through the I-610 interchange;
- e. Coordinating land acquisition to maximize green space, especially north of I-610;
- f. Spanning Halls Bayou to preserve the opportunity for extending the Halls Bayou Greenway;
- g. Provide meaningful connections to dedicated, on-street bike connections feeding into the Little White Bayou as identified in the Houston Bike Plan; and
- h. Maximizing public access and park opportunities for any highway decking through the Woodland Heights neighborhood.

Many of these comments were included in previous letters we sent to you on December 3, 2013 and May 29, 2015, during the scoping process (enclosed). We have also enclosed a few diagrams to demonstrate our above points. Thank you for the opportunity to provide this input for the comment period.

Conclusion

The Houston Parks Board continues to stand ready to work with TxDOT on the North Houston Highway Improvement Project to produce the best possible result for the greater Houston area.

Sincerely,



Beth White
President & CEO
Houston Parks Board



Directors

Thomas G. Bacon
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Nina O'Leary Zilkha
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Barron Wallace
Don Woo

Joe Turner
Ex-Officio

Roksan Okan-Vick, FAIA
Executive Director

December 3, 2013

Texas Department of Transportation
Houston District
P.O. Box 1386
Houston, Texas 77251-1386

Re: North Houston Highway Improvement Project

Dear Madam/Sir:

I write to ask for certain modifications to your proposed North Houston Highway Improvement Project to ensure connectivity for bicyclists and pedestrians in light of our ongoing work along the City of Houston's bayous. The Houston Parks Board's and the City of Houston's Bayou Greenways 2020 project creates a network of shared use trails along 9 of the major bayous within the City in order to create a 150-mile integrated transportation network for pedestrian and bicycle-based transportation. This system will also create a network of parks along these shared use trails that have significant environmental, economic, and public health benefits for our City. These trails will be built to federal standards and will tie into similar trails built in recent years by the Texas Department of Transportation (TXDOT) and the City of Houston. The total public and private investment for this new network will be \$215,000,000. The citizens of Houston have overwhelmingly supported using \$100,000,000 of park bonds for the project, and separately, the Houston Parks Board has raised over \$70,000,000 of matching funds thus far. We plan to complete the network in 2020.

The Bayou Greenways 2020 project however does not include Little White Oak Bayou, which parallels and crosses Interstate 45 North and its interchange with Loop 610 North numerous times. The design of these crossings has made it impossible for us to include this important waterway in our program. As a result, a significant area of north Houston may not have access to shared use trails or the connected parkland along White Oak Bayou unless you incorporate some elements to ensure pedestrian and bicycle connections in your proposed North Houston Highway Improvement Project.

We have reviewed your alternatives for Segment 1 and Segment 2 for the North Houston Highway Improvement Project, and believe there is a unique and important opportunity to ensure that residents have manageable connections to the Bayou Greenways 2020 project. Thus, we specifically request that you incorporate the following into your plans:

1. A continuous shared use trail along Little White Oak Bayou from its confluence with White Oak Bayou immediately south of Quitman Street to the north-most point where the modified I-45 right-of-way is adjacent to Little White Oak Bayou, which we understand could be considerably north of I-610.
2. A shared use trail connector across I-45 North between Woodland Park and Moody Park to ensure access to these important parks.
3. A shared use trail connector across I-45 between Patton and Jewett Streets to ensure connectivity.
4. A shared use trail connector through the I-45/I-610 interchange, since we have found that these interchanges often present the biggest problems for pedestrian and bicycle traffic.

We would appreciate a meeting to discuss this important link to our Bayou Greenways 2020 project. Please contact me at 713-942-8500 or roksan@houstonparksboard.org. Thank you for your consideration of this important proposed transportation facility within Houston's growing pedestrian and bicycle transportation network.

Sincerely,


Roksan Okan-Vick, FAIA
Executive Director

Houston Parks Board
300 North Post Oak Lane
Houston, Texas 77024
713.942.8500
Fax 713.942.7664
www.houstonparksboard.org



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Roksan Okan-Vick, FAIA
Executive Director

May 29, 2015

Texas Department of Transportation, Houston District
P.O. Box 1386
Houston, Texas 77251

Re: North Houston Highway Improvement Project

Attn: Quincy Allen, P.E.

We write to ask that Texas Department of Transportation (TxDOT) take into account a number of important considerations as TxDOT continues with its proposed North Houston Highway Improvement Project. Taking into account these and other factors will help ensure protection of parkland and greenspaces and will enhance and preserve connectivity for bicyclists and pedestrians. The Houston Parks Board does not have an opinion with respect to the merits of the project regarding automobile transportation. But if the project does go forward, we respectfully request that the changes highlighted below be made to avoid adverse impact on nearby park and public greenspace and on other important community projects. We also respectfully request that we maintain the right to make comments in the future as the process continues.

The Houston Parks Board and City of Houston's Bayou Greenways 2020 project is creating a continuous system of parks along Houston's major waterways. A major feature of the system is a network of shared use trails along nine of the major bayous within the City. This ambitious effort will result in a 150-mile alternative transportation network for pedestrians and bicyclists in the midst of public access parkland and, at the same time, will greatly increase acreage of parks in the City. Bayou Greenways 2020 will have significant environmental, economic and public health benefits for our City. These trails will be built to federal standards and will tie into similar trails built in recent years by TxDOT, the City of Houston, and other public entities.

The total public and private investment for this new network will be at least \$220 million, funded by a \$100 million bond overwhelmingly supported by the citizens in 2012, with the balance to be secured by the Houston Parks Board in private and other matching funds. The Houston Parks Board has raised more than \$90 million of private, matching funds thus far.

We have met with Pat Henry and Bill Brudnick of your team and reviewed what we understand to be the publicly available information on proposals for the North Houston Highway Improvement Project. The size and scope of the project and its siting near important bayous and greenspace means that the project poses significant risk to Bayou Greenways 2020 and to Houston's greenspaces. On the other hand, we believe that if designed and executed properly, there are important opportunities for the project to provide connections to Bayou Greenways 2020, to create new park options for Houston, and to enhance Houston's overall transportation options. We also trust that the forthcoming Draft EIS will include robust analysis of the potential impacts and benefits to pedestrian and bicycle facilities.

We specifically request you incorporate the following into your plans:

1. Minimize encroachment of the widened freeway on Little White Oak Bayou south of I-610 by removing the south bound frontage road or acquiring land on the opposite side of the freeway.
2. Minimize encroachment of widened freeway on White Oak Bayou at I-10 by use of more elevated lanes to narrow the required right-of-way width.

3. Within the same watershed and preferably along the impacted bayou corridor, mitigate heavily for any and all loss of greenspace along the bayou corridor as a result of this project. Specifically, consider acquiring land along Little White Oak Bayou just north of I-610 to incorporate park-like detention parcels between the freeway and the Bayou.
4. Build all detention areas to be dual use with stable and accessible trail benches along high banks so that Houston can later add trails and amenities to the areas and allow for both recreational and detention use.
5. Build all detention areas to clean road-polluted water with wet bottom cleansing ponds and other filtration techniques in order to mitigate the adverse water quality impact of new roadways. Plans should be developed to remove debris and keep these catchment systems clean. TxDOT should assume responsibility for this trash collection, as the trash will be carried by storm water from TxDOT facilities. These facilities should be explicitly designed to be dual park and stormwater use, with trash maintenance provided by TxDOT.
6. Build road drainage systems to remove (filter) all debris and trash generated by the road before drainage reaches the creek and bayou systems in order to mitigate adverse water quality impact of roadway.
7. Provide stable benches where minimum 10' shared-use trails can be built in the future on both sides of every waterway crossed. Design freeway crossings taking future trails into account and leave these areas trail-ready to maximize efficiency of the public dollar.
8. Provide simple signage equivalent to river crossings at major bayou crossings (Buffalo, Little White Oak, White Oak, etc.).
9. Maintain Bayou Greenway and trail accessibility during construction. We understand that at some point existing trails may need to be closed for safety. When such closures are inevitable, safe access should be provided via a trail on the opposite side of the waterway. Situations like the recent two-year closure of the White Oak Bayou trail, without a safe alternative crossing on the opposite bank, should be avoided.
10. Acquire and design adequate freeway verges to allow significant tree plantings along all roadways to mitigate the adverse visual, sound and air quality impacts. Use only native tree and large native shrubs to mitigate adverse impacts on habitat and to ensure cost effectiveness though long life of hardy plantings and reduced mowing.
11. Build minimum 10' wide shared-use paths parallel to and separated from frontage roads. The currently proposed 15' wide lanes with a shared use are not appropriate, as mixing bicycles with 50+ MPH vehicle traffic leads to fatalities, and pedestrians also need to be accommodated.
12. For all proposed depressed segments where park development can occur, provide a structural framework and dirt fill above in order to readily accommodate a vegetated and scenic greenway park.
13. If eliminated due to construction, replace existing shared used facilities along Little White Oak Bayou.
14. Develop a greenway and 10' wide shared use trail along Little White Oak Bayou wherever possible, including
 - The segment from its confluence with White Oak Bayou to the north-most point where the modified I-45 right-of-way is adjacent to Little White Oak Bayou.
 - The segment between Woodland Park and Moody Park.
 - The segment across I-45 between Patton and Jewett Streets.
 - The segment through the I-45/610 interchange.

Because this bayou corridor is impacted by the freeway project for several miles, this amenity and facility that accommodates other modes of transportation (biking and walking) should be part of TxDOT's scope in that area.

15. Consult with the Houston Parks Board for new bike and pedestrian access facilities built by TxDOT. Along some sections of the current I-45 segments, TxDOT has previously built trails that do not connect to other trails. The Houston Parks Board believes it can help TxDOT avoid this situation in the future.
16. To the extent the current MKT trail (Heights Hike & Bike Trail) is impacted by construction, preserve connectivity by replacing the impacted segment with a bridge that would parallel the current railroad bridge over White Oak Bayou.
17. All new surface street bridges that are required should be of sufficient width so as to accommodate separated shared use pedestrian/bike paths. As many of these bridges will accommodate high speed traffic, mixing bicycles and vehicles creates unsafe conditions.
18. Carefully design all intersections where freeway traffic enters urban areas in order to maximize vulnerable user safety. For example, the termination of the proposed spur at Allen Parkway should be designed in order to accommodate safe pedestrian crossings at that intersection and in a way that drivers are reminded that they are entering a park.
19. The intersections of frontage roads and surface streets should be designed in order to maximize pedestrian and bicycle safety, not vehicle speed. High speed right turns with yield signs and other unsafe features should be assiduously avoided.

Thank you for your consideration of our comments. Please do not hesitate to contact me with any questions.

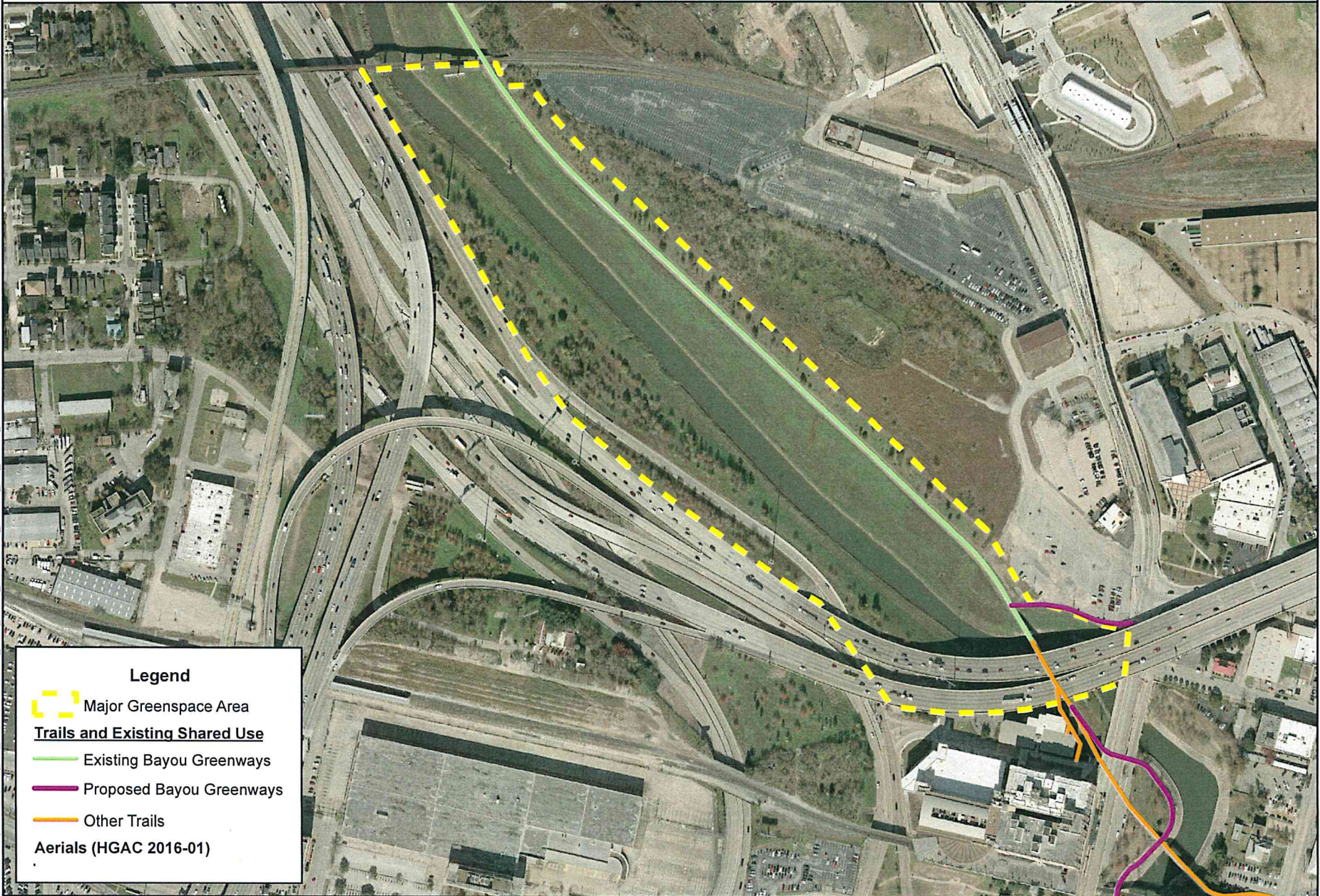
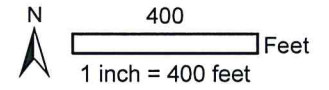
Sincerely,



Roksan Okan-Vick, FAIA
Executive Director

White Oak Bayou Greenway

Segment WO01: Before I-45 Expansion



Legend

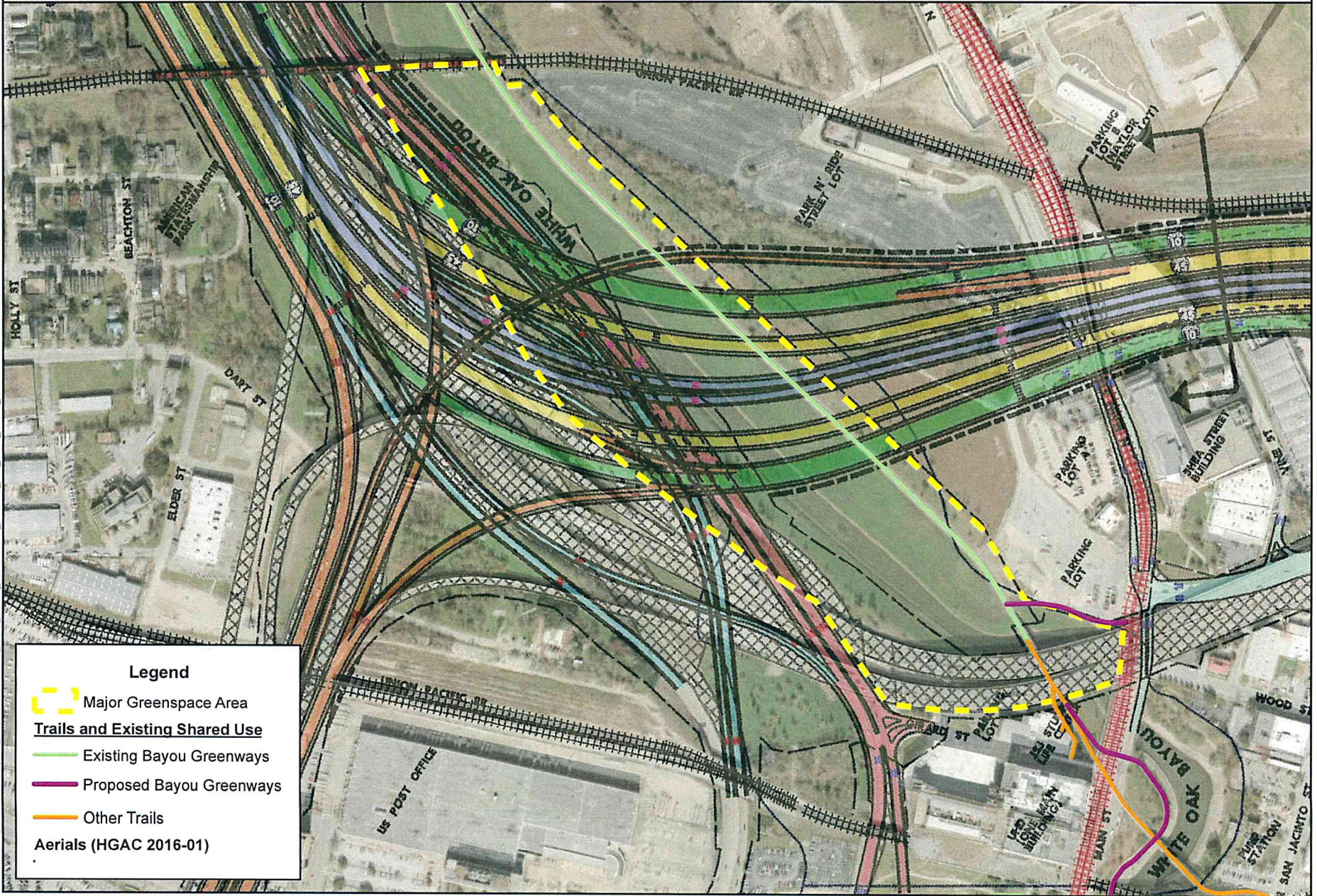
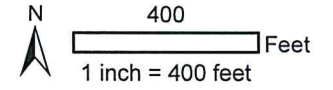
- Major Greenspace Area
- Trails and Existing Shared Use**
- Existing Bayou Greenways
- Proposed Bayou Greenways
- Other Trails

Aerials (HGAC 2016-01)

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White Oak Bayou Greenway

Segment WO01: After I-45 Expansion



Legend

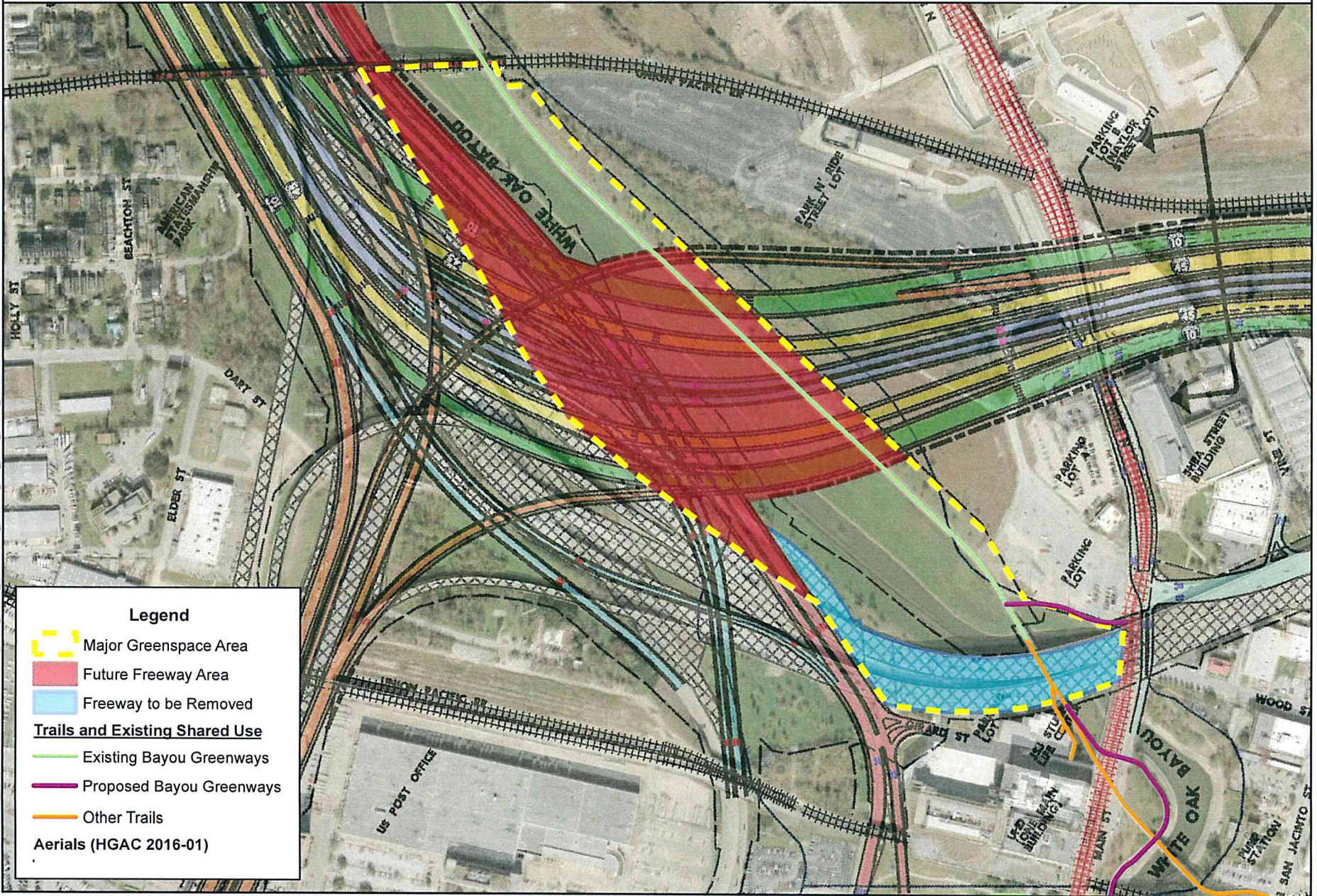
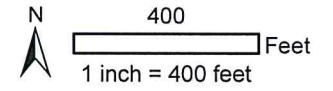
- Major Greenspace Area
- Trails and Existing Shared Use**
- Existing Bayou Greenways
- Proposed Bayou Greenways
- Other Trails

Aerials (HGAC 2016-01)

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White Oak Bayou Greenway

Segment WO01: After I-45 Expansion



Legend

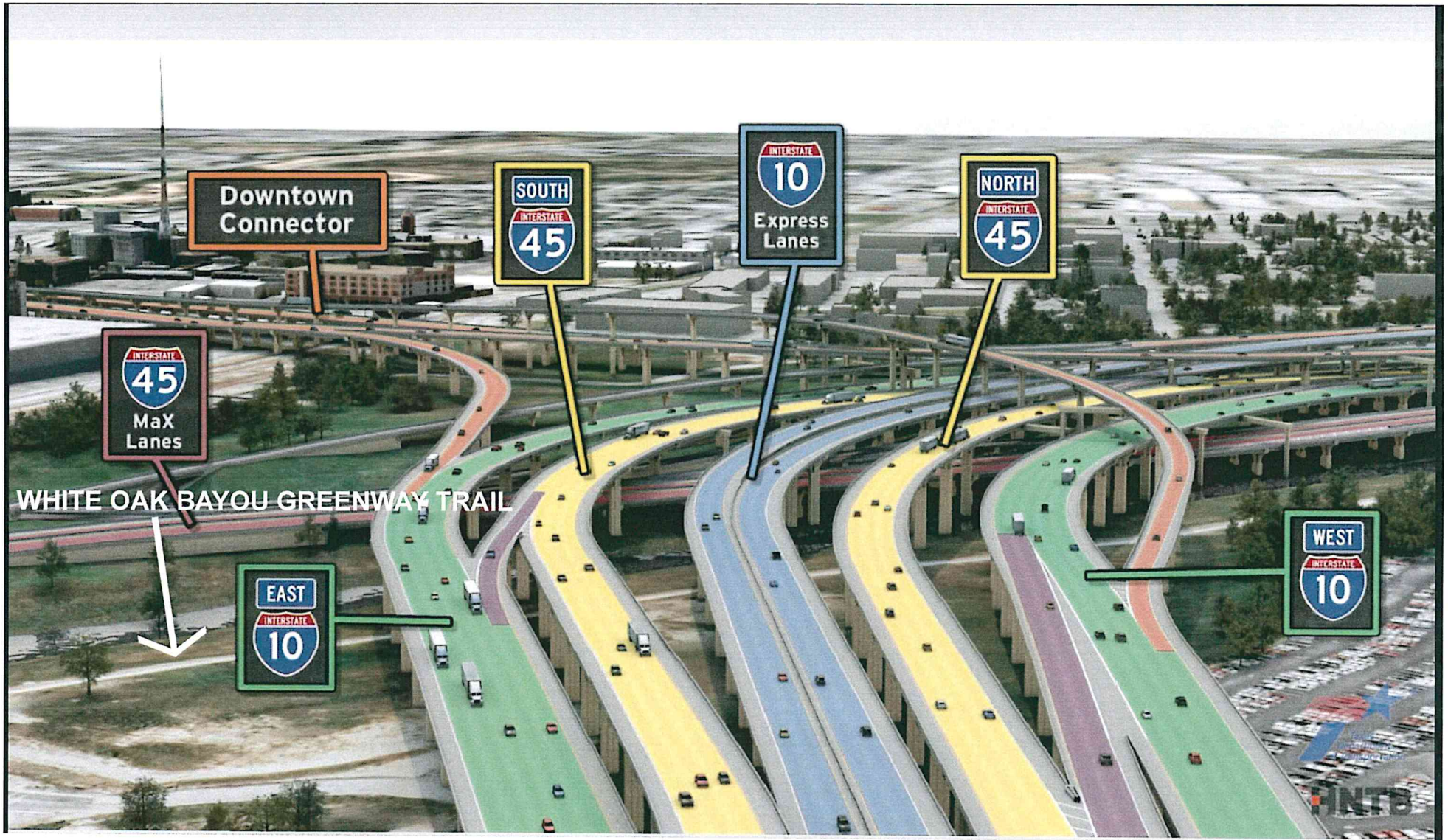
- Major Greenspace Area
- Future Freeway Area
- Freeway to be Removed

Trails and Existing Shared Use

- Existing Bayou Greenways
- Proposed Bayou Greenways
- Other Trails

Aerials (HGAC 2016-01)

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NEW MULTI-LANE FREEWAY ALIGNMENT OVER WHITE OAK BAYOU OPEN SPACE AND TRAIL



**WHITE OAK BAYOU GREENWAY FROM THE TRAIL NEAR HOGAN STREET
LOOKING SOUTHEAST TOWARDS DOWNTOWN**



WHITE OAK BAYOU GREENWAY LOOKING NORTHWEST TOWARDS HOGAN STREET FROM THE UNIVERSITY OF HOUSTON DOWNTOWN

	Freeway to be Added	Freeway to be Removed	Net Total
White Oak Bayou Greenway / Freed Park	22 ac	4 ac	18 ac
Little White Oak Bayou Greenway	13 ac	3 ac	10 ac
Buffalo Bayou Greenway / Downtown Parks	4 ac	5 ac	-1 ac
Net Loss of Greenway			27 ac

Detailed Breakdown of Park Impact (acreages are included in the above Greenway calculations)

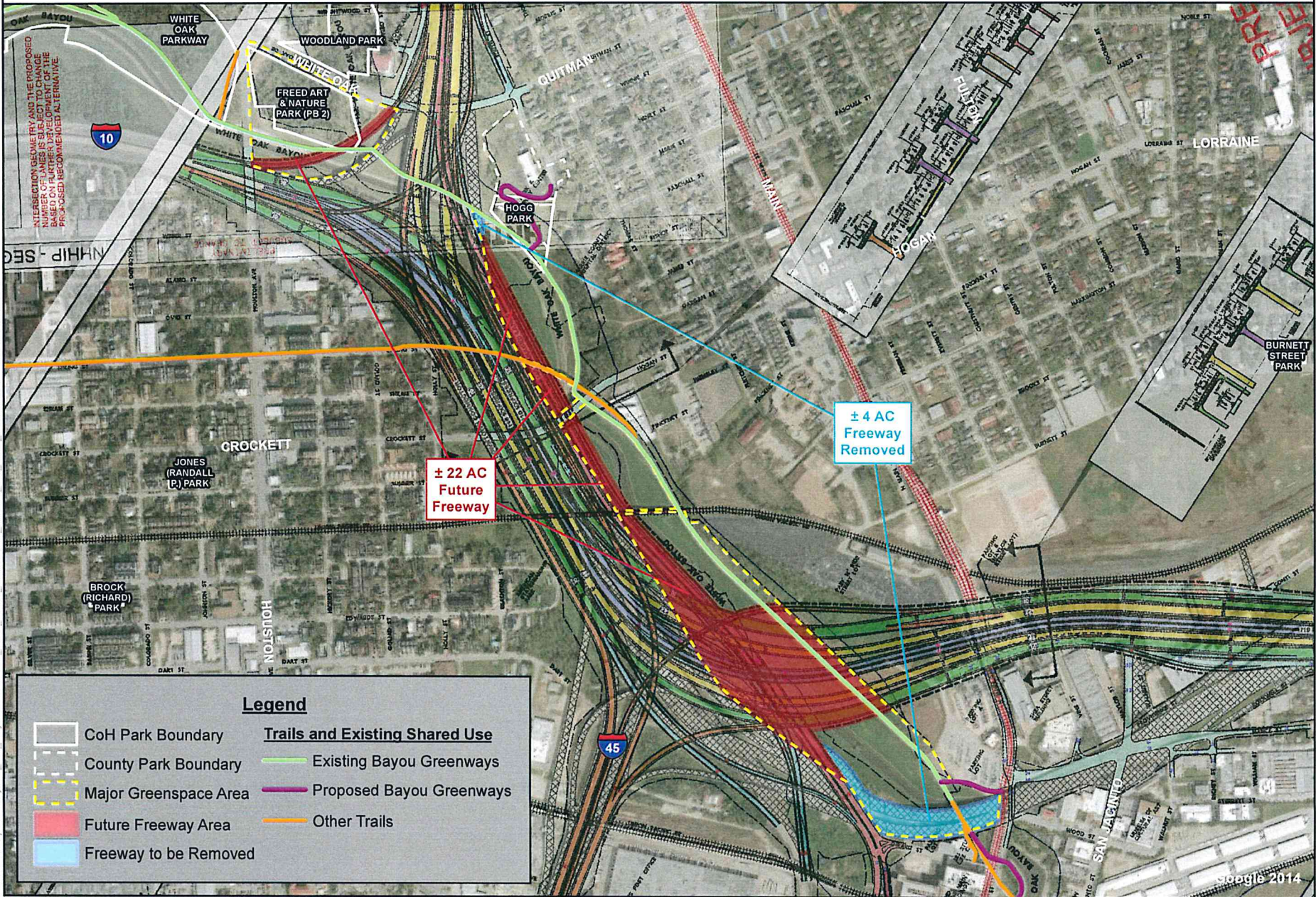
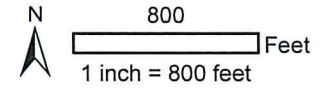
	Freeway to be Added	Freeway to be Removed	Net Total
Freed Park	0.17 ac	-	0.17 ac
Linear Park	2.35 ac	0.01 ac	2.34 ac
Sam Houston Park	0.63 ac	-	0.63 ac
Sesquicentennial Park	0.13 ac	-	0.13 ac
'Current' Parkland Impacted			3.27 ac

Existing Trails (By Others) Lost by Freeway Expansion

	Trail Removed
Little White Oak Bayou Greenway	0.2 mi

White Oak Bayou Greenway

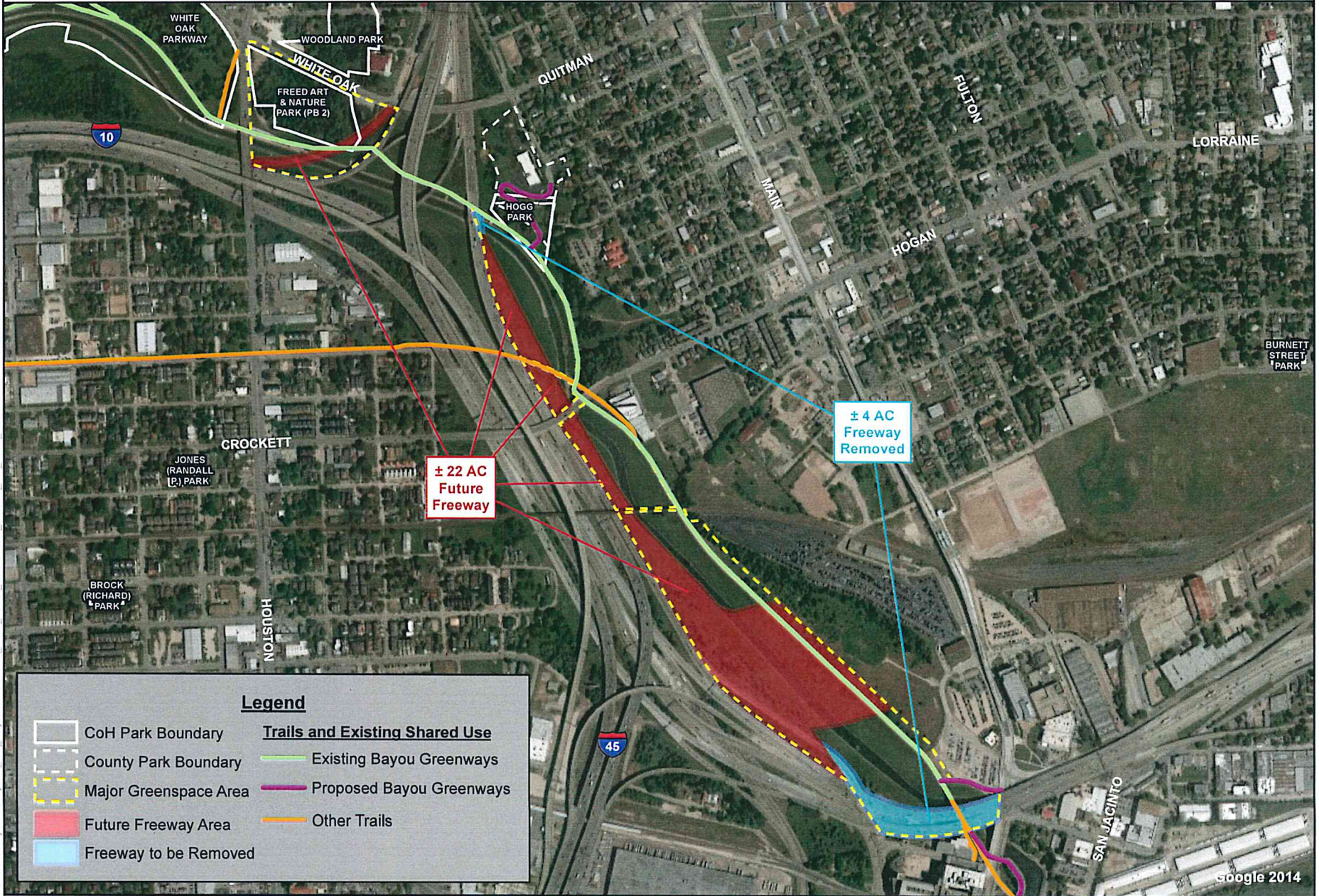
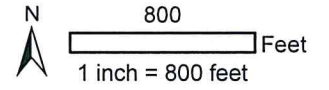
Segment WO01: After I-45 Expansion



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White Oak Bayou Greenway

Segment WO01: After I-45 Expansion

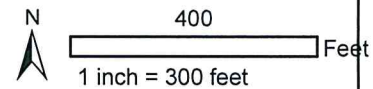


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Legend	
	CoH Park Boundary
	County Park Boundary
	Major Greenspace Area
	Future Freeway Area
	Freeway to be Removed
Trails and Existing Shared Use	
	Existing Bayou Greenways
	Proposed Bayou Greenways
	Other Trails

Buffalo Bayou Greenway

Prairie to Allen Pkwy : After I-45 Expansion

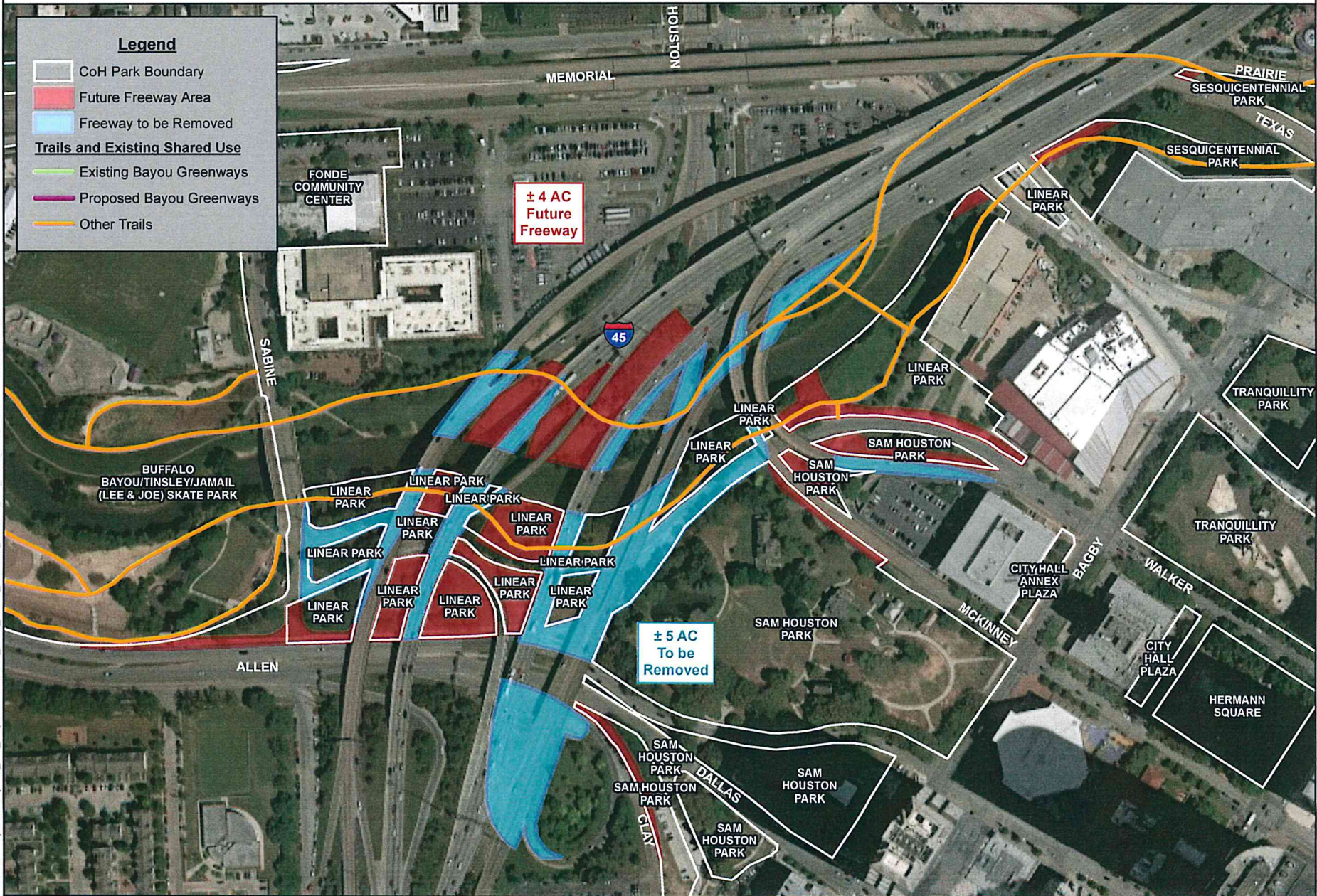


Legend

- CoH Park Boundary
- Future Freeway Area
- Freeway to be Removed

Trails and Existing Shared Use

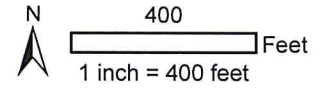
- Existing Bayou Greenways
- Proposed Bayou Greenways
- Other Trails



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White Oak Bayou Greenway

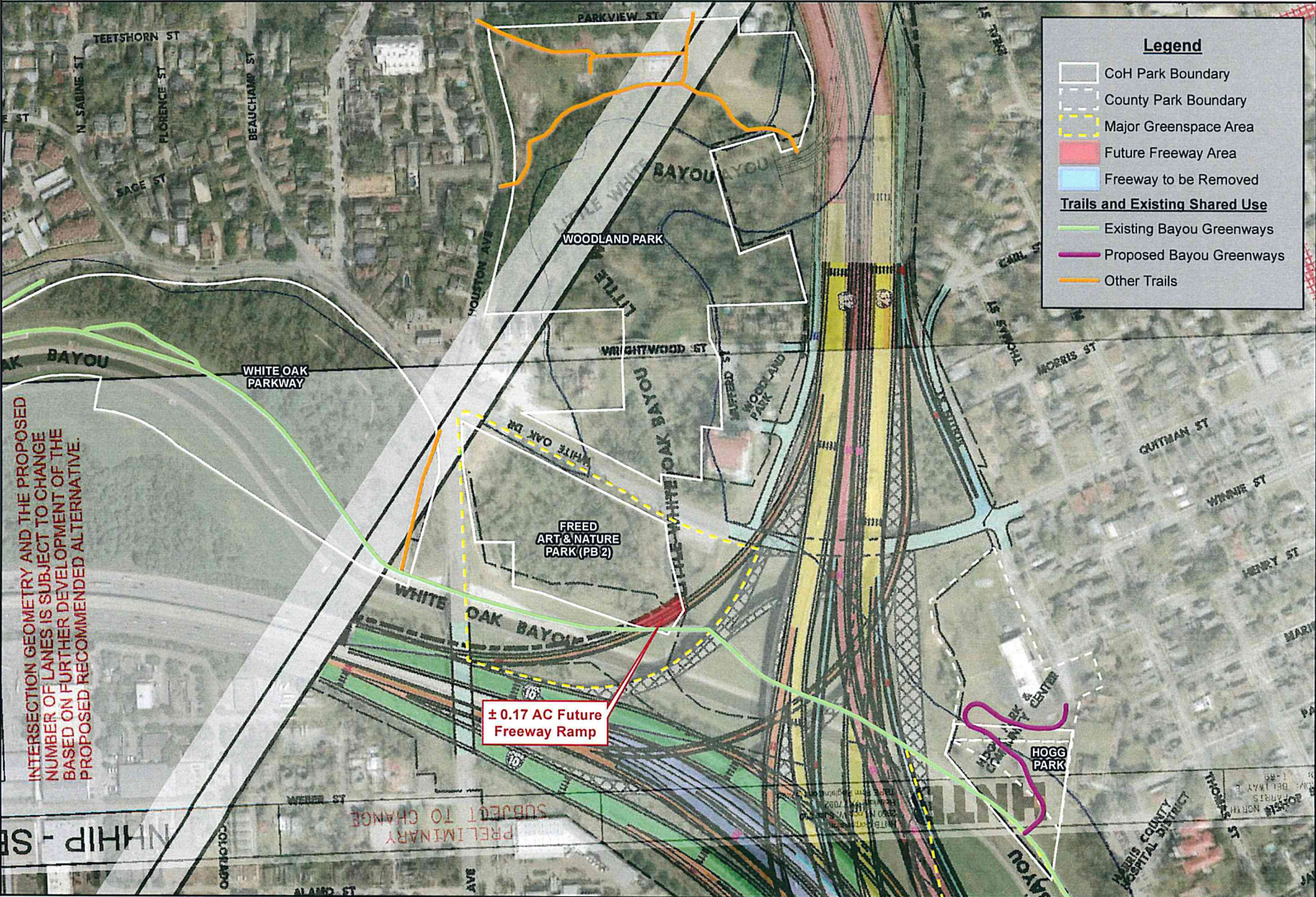
Freed Park: After I-45 Expansion



Legend

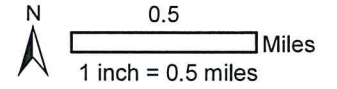
- CoH Park Boundary
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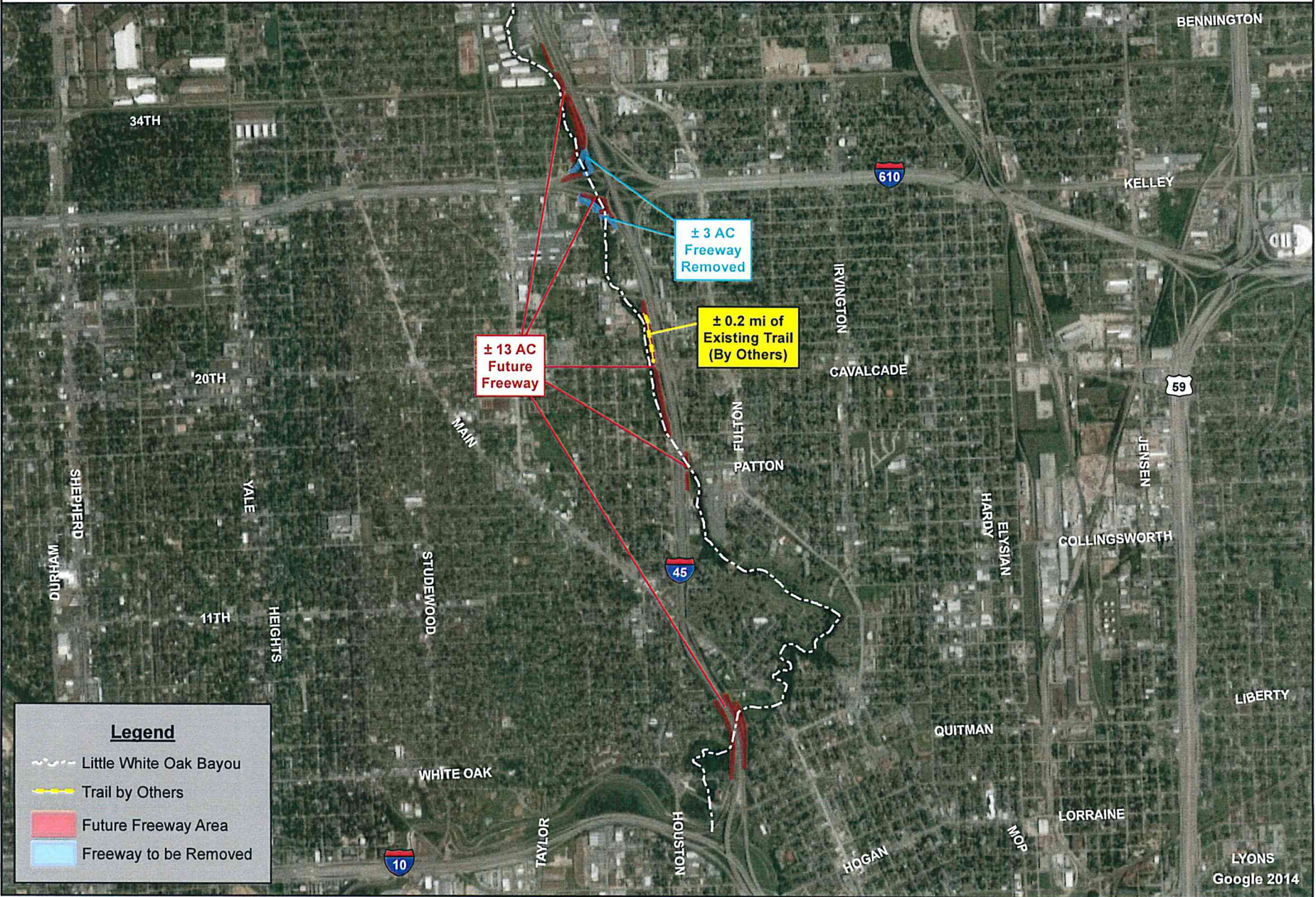


Little White Oak Bayou Greenway

Segment PS12-001: After I-45 Expansion



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Legend

- Little White Oak Bayou
- Trail by Others
- Future Freeway Area
- Freeway to be Removed

LYONS
Google 2014



LITTLE WHITE OAK BAYOU

PATTON ST

LITTLE WHITE OAK BAYOU

TWENTY LANES OF TRAFFIC OVER LITTLE WHITE OAK BAYOU ON I-45



LITTLE WHITE OAK BAYOU

LITTLE WHITE OAK BAYOU AT I-610 AND I-45