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Eliza Paul, District Director
Texas Department of Transportation
Houston District Office
7600 Washington Avenue
Houston, Texas 77007

SUBJECT: Public Comments for the NHHIP's Community Impact Assessment Technical Report and the Cumulative Impacts Technical Report

Dear District Director Eliza Paul, P.E.,

I write to you to respectfully requesting that the leadership of the Texas Department of Texas (TxDOT) consider alternative proposals to the existing/current proposal for the North Houston Highway Improvement Project (NHHIP). Alternative proposals take into consideration the concerns of local communities directly affected by this project and will give the region the option to start building the infrastructure needed to incentivize multi-modal transportation, rather than continuing dependency on single occupancy vehicles.

A few months ago, my staff created a bilingual community survey about this project. The survey was open for two weeks, and over 900 people responded. Fifty-two percent of the survey respondents were against the original project proposal. In addition, the neighborhoods located within Precinct 2 (zip codes 77002, 77007, 77009, 77022, 77003, 77011, 77012, 77023, 77087, and 77076) were overwhelmingly against it with 71% saying they disagree with the plan. The top four concerns from this project were: safety, connectivity, flooding, and air quality.

I understand that TxDOT is focusing on the VisionZero public awareness campaign to reduce highway vehicle crashes. The current plan only addresses safety conditions on the highway itself and does not address the increased safety risk on the frontage roads and connecting neighborhood roads associated with the proposed design. We must first improve the safety conditions of the current highway system, including frontage roads to connect with

neighborhood streets, while also minimizing displacement of families, mitigating flooding, reducing air and noise pollution, while focusing on improving the infrastructure needed for public transportation and pedestrian-friendly bike lanes and sidewalks.

A plan that reduces the number of single-occupancy vehicles on the road will reduce highway car crashes. Transportation engineers advise, and recent history in Houston has shown, that adding more lanes to the freeway will only temporarily fix congestion. Inevitably, over time, adding more single-occupancy vehicles to the freeway system only serves to worsen congestion.

Estimates show that allocating bus lanes will increase capacity to 14,400 people per hour per lane. A four-car light rail can increase a route's capacity to 21,600 people per hour, whereas a freeway lane being used by single-occupancy vehicles allows only 2,000 people per hour to be moved from one place to another. In addition, increasing ridership on public transit means our region would become eligible for federal funding for future capital projects on public transportation (Congressional Research Service). Therefore, we need to consider reducing the number of general-purpose lanes and offer motivation for drivers to carpool or use public transit. This is once-in-a-lifetime opportunity to change the culture of transportation for the region, and we should use this unique opportunity to increase capacity through public transit.

The additional attachment below includes a detailed analysis of the following topics: community connectivity, housing, safety, flooding, air quality and frontage roads. I would prefer an alternative plan that will do more for flood mitigation, eliminate catastrophic displacement of families and businesses, reduce air and noise pollution, keep more communities connected, improve bike and sidewalk access for the safety of pedestrians, and incentivize multi-modal transportation.

Once again, I encourage and request TxDOT to select an alternative proposal for NHHIP. The City of Houston has convened several community meetings and residents have been asked to consider alternate designs to TxDOT's existing proposal. I would ask that TxDOT seriously consider what the community ultimately desires.

I look forward to hearing back from you and continuing to work together to ensure that this project is in the best interest of all communities.

Respectfully,

A handwritten signature in black ink that reads "Adrian Garcia". The signature is written in a cursive, flowing style.

Adrian Garcia

Harris County Commissioner, Precinct 2

NHHIP Analysis

Community Connectivity and Housing

Highway expansion projects have historically displaced low socioeconomic households and communities of color and disconnected communities to make room for growth. We cannot continue this pattern. According to the community survey that my office produced, on a scale from 1 (least concerned) to 5 (most concerned), 62% of the survey respondents rated community connectivity with a 4 or 5. Respondents are worried that communities will be split-up/eliminated because of the highway expansion project. NHHIP should not only benefit suburbs but rather, it should benefit all of those that live in our region. Local communities should receive a positive impact from this project too. The construction of NHHIP will impact hundreds of businesses, government offices in downtown, while making congestion worse for employees and residents who need to do official business in places like courts, tax offices, or other agencies.

In the Community Impact Assessment Technical Report, it mentioned that NHHIP will displace several small local neighborhood clinics, an urgent care center, a preventative medicine clinic, and one of the Texas Health and Human Services Offices (where people apply for social benefits like SNAP, Medicaid, WIC, etc.). In this report, TxDOT determined these displaced public health and healthcare facilities will cause minimal impact because other nearby facilities are about 10 miles away from where a displaced property was located. TxDOT also mentioned that individuals could use the internet to apply for government assistance or visit a library to get access to the internet. However, 10 miles is a difficult commute for anyone without a vehicle. Metro has stated that several of the stops and routes near the NHHIP will be heavily impacted during the construction. Ten miles on the bus is a long commute if you live with a disability, are pregnant, traveling with young children, have an illness, or simply lack the means to afford personal transportation.

Additionally, there are certain census tracts within Precinct 2, especially within Aldine, that show a significant percentage of households that [lack internet access](#) in their homes (ACS 2017), which would mean there are going to be individuals that would require the use of public transportation just to get to the nearest library. According to Executive Order 12898 and Title VI of the Civil Rights Act, there is an emphasis on *“to avoid, minimize disproportionately high and adverse human health and environmental effects, including social and economic effects, on minority and low-income populations.”* The displacement of these facilities would be considered *“adverse human health effects”*. We cannot keep adding lanes at the expense of neighborhoods, and we must not keep repeating the history of expanding freeways at the expense of low socioeconomic status families and people of color. TxDOT admits to the local impact of racial and economic disparity within the Community Impact Assessment Technical Report on page 264, *“Based on the demographics of the adjacent super neighborhoods, the effects of the project would be predominantly borne by minority and low-income populations. Similarly, because of*

income limitations and/or limited English proficiency, the adverse effects on minority and low-income populations could be more severe than the adverse effects that would be suffered by the non-minority population and/or non-low-income population”.

Recommendations from local communities and stakeholders:

- Re-open Preston St underpass.
- Keep Runnels St open.
- Keep the North Main at I-45 southbound exit because this is one of the limited connectors in Downtown for the surrounding Northside and other local communities
- Build the San Jacinto-Fulton connection to increase connectivity to Downtown, which is currently very limited. This would help alleviate congestion and create additional options
- Keep the Jensen eastbound exit because of its importance in keeping the Greater East End and Northside communities and businesses connected.
- Keep Providence at grade to allow for business access (ex: Saint Arnold’s Brewery).
- If displacements are unavoidable, create and implement a comprehensive housing assistance program in collaboration with the City of Houston, Houston Housing Authority, and Harris County. Provide relocation assistance that goes above and beyond market value, increase transparency, make counseling services available, assist renters with funds to offset costs (ex: relocation assistance, renter assistance, given/first month rent, deposit).

Safety

According to a Harris County Engineering Department, the recent NHHIP reports have limited analysis that can predict the safety benefits of the project. TxDOT has stated that improving safety will be achieved by designing the facility to current design standards.

Recommendation: There needs to be specific evaluation for opportunities to improve safety measures especially with regards to sidewalk and biking safety.

Flooding

Precinct 2 suffered from extreme flooding from Hurricane Harvey and Tropical Storm Imelda. According to the community, on a scale from 1 (least concerned) to 5 (most concerned), 60% rated flooding as a 5 with worries stated that the project would lead to more flooding in the future. Almost 600 respondents listed flooding as a top-three concern. Currently, the design for NHHIP is said to be only resilient for a 100-year flood.

Recommendation: The design model should be resilient at 500-year level flood.

Air Quality

Precinct 2 contains multiple communities with a history of environmental injustice. Reducing air pollution is a critical part of environmental justice. According to the community respondents to the survey, on a scale from 1 (least concerned) to 5 (most concerned), almost 40% of the survey respondents rated air quality as a 5. Respondents were concerned that increased air pollution from the highway expansion project would have a negative impact on their well-being. Almost 500 survey respondents listed “air quality” as one of their first, second, or third biggest concern. Widening I-45 would bring the highway closer to residential homes and schools in the surrounding neighborhoods, meaning local communities will suffer adverse health impacts. According to an Air Alliance Houston analysis on the quality of air from NHHIP, “.”Expanding the highway will cause a “*disproportionately high and adverse human health...on minority and low-income populations*” (EO 12898 and Title VI of the Civil Rights Act). TxDOT should consider avoidance and minimization of these potential adverse health effects.

Recommendations from local communities and stakeholders:

- Install HEPA quality filtration in buildings especially in schools and community centers.
- Install community air monitors so residents can be informed about the air quality in the community.

Frontage Roads

According to the community, on a scale from 1 (least concerned) to 5 (most concerned), almost 55% rated bike and street safety as a 4 or 5. For future transportation planning and development, we should view traffic safety in a more comprehensive way aside from just looking at highway safety. Traffic safety should also take into consideration frontage and community roads. Currently, I-45 has a disproportionate amount of bike and pedestrian crashes along the frontage roads.

Recommendations from local communities and stakeholders:

- Evaluate viability of two-lane feeders with trees on both sides and 10-foot wide multi-use sidewalks.
- Reduce lane width to less than 12ft each and two lanes.
- Implement more pedestrian-oriented lighting.
- Ladder style crosswalks that are highly visible.
- Bilingual accessible pedestrian signals.
- Fully implement high comfort bike facilities in like those mentioned in the Houston Bike Plan.
- Separate bike lanes by elevating them and adding barriers.