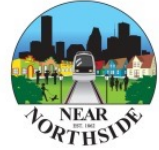




Super Neighborhood 51 Leadership Team

Houston's Near Northside



July 27, 2017

TxDOT Houston District Office
Director of Project Development
P.O. 1386
Houston, TX 77251-1386

HOU-PIOWebmail@txdot.gov

Re: North Houston Highway Improvement Project
Public Comments by Super Neighborhood #51 Leadership Team

Dear TxDOT Representatives:

The Super Neighborhood #51 Leadership Team has significant concerns about the effect that the proposed I-45 construction (Segments 2 & 3) will have on the quality of life and future development of the Near Northside. In the first instance, we urge that the North Houston Highway Improvement Project (“NHHIP”) not be built. In ten years, the additional lanes will only mean more traffic and greater congestion. We agree that I-45 through downtown Houston needs to be revamped and improved, but as far as increasing traffic flow between downtown and north Houston, we believe a better use of resources would be to build a commuter rail down the middle of I-45. However, we are not so naive as to believe that the NHHIP will not be built. Therefore we address our concerns in this letter. To further understand them, it is necessary to appreciate (a) the history and demographics of the two neighborhoods bordering I-45, south of I-610 (the Near Northside and the Greater Heights), as well as (b) the injustice to the Near Northside that the NHHIP will cause.

PART 1

DEMOGRAPHICS, HISTORY AND INJUSTICE

Demographics:

Super Neighborhood #51 represents Houston's Near Northside, which is immediately north of downtown and south of Crosstimbers St., east of I-45 up to and including Elysian St. The Near Northside includes lower income residents of diverse ethnicity, the overwhelming majority (80%+) of which are Hispanic. Median household income (as of 2012) was \$30,258 with 40% of residents earning less than \$25,000 per year. Also, at that time, 45% of Near Northside Residents did not have a high school diploma. Housing was 54% renter occupied with 7% of the residents being unemployed and 40% not in the labor force. Spanish is the predominate language.

The demographics of the Near Northside contrast greatly with those of the Greater Heights Super Neighborhood 15, directly across I-45 from the Near Northside. In 2012, the median income in the Greater Heights was \$70,102; 50% of the residents had a bachelor's degree or higher; and 72% were employed.

History:

Before the construction of I-45, these two neighborhoods (Near Northside & Greater Heights) were one with similar socio-economic demographics. After the construction of I-45, however, these two neighborhoods developed in drastically different ways with obvious wealth and development going to the Greater Heights neighborhood. Since the bifurcation, the Greater Heights has recently become one of the most sought after neighborhoods in the City of Houston, while the Near Northside has languished and often been “forgotten”.

Injustice:

Many of our concerns about the proposed I-45 construction relate to the economic and environmental injustice that the project will exacerbate in the Near Northside. As stated by the NHHIP’s Draft Environmental Impact Statement, ES-4, “All alternatives [of the construction project] would cause disproportionate high and adverse impacts to minority or low-income populations. While minority and low-income individuals and community facilities in the project area would be adversely impacted by the proposed project, no reasonable alternatives would avoid adverse impacts or have substantially less overall adverse impacts than other alternatives.”

This is unacceptable. Alternative plans and solutions for the project’s isolation of the Near Northside must be made. The Texas Department of Transportation (“TxDOT”) recognizes that it is charged with developing strategies for environmental justice. The Draft Environmental Impact Statement states:

“Executive Order (EO) 12898-Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations requires federal agencies to “make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations” (Office of the President 1994). EO 12898 also directs agencies to develop a strategy for implementing environmental justice.”

To say there are “no reasonable alternatives” leaves disadvantaged neighborhoods such as the Near Northside in an untenable position. We strongly suggest that TxDOT reassess its position regarding environmental and economic injustice.

PART 11

ECONOMIC AND
ENVIRONMENTAL INJUSTICE
CAUSED BY ISOLATION OF THE NEAR NORTHSIDE

Our major concern is the isolation of the Near Northside due to NHHIP’s plans to remove much of the current access into and out of the neighborhood. One of the most advantageous aspects of the Near Northside is its easy access to I-45, I-610 and I-69 as well as to downtown and the Greater Heights. The isolation caused by the NHHIP will result in the disadvantaged population of the Near Northside disproportionately bearing the burden of the project and will create greater economic and environmental injustice. Among these disproportionate burdens are significantly increased travel times, increased traffic on residential streets, increased noise and air pollution, decreased desirability of the area and decreased opportunity for economic development.

A. Isolation of the Near Northside Due to the Removal of the North Street Bridge

The proposed removal of the North Street bridge isolates the Near Northside from the Greater Heights as well as from a connection into downtown, to the First Ward and to the growing shopping areas on Sawyer, Studemont & Yale Streets.

The North Street bridge is vital to the surrounding neighborhood just east of I-45 because of the existence of the White Oak Music Hall (“WOMH”), at 2915 N. Main Street, and the traffic/parking issues that result from concerts there. So many patrons attend WOMH concerts that ending North Street at I-45 would significantly increase back-up and congestion in an area that already suffers a tremendous amount of congestion due to concert attendance. WOMH is one of the few new business endeavors in the Near Northside. Removing the North Street bridge would have a debilitating impact on its patrons as well as the nearby residents, resulting in further economic and environmental injustice.

The North Street bridge, because of less traffic during non-concert times, is also a vital bike & pedestrian connector into the Greater Heights, to Houston Avenue and subsequently to the First Ward and downtown. The bridge at North Main St. is far too busy to be conducive to bikes or pedestrians. The proposed northbound braided ramp from I-10 and I-45 should be moved south to allow for the North Street Bridge. If that is not feasible, the surrounding neighborhood must have access to the frontage road or other egress to I-45 other than North Main St. since blocking off the end of North St. (as a dead end) at I-45 will cause unmanageable congestion.

B. Isolation Due to Loss of Access to and from the Near Northside

The NHHIP will result in a severe decrease in access to and from the Near Northside. The disadvantaged population of the Near Northside disproportionately bears the burden of the project. Among the disproportionate burdens are significantly increased travel times, increased traffic and pollution on residential streets, decreased desirability of the area, decreased opportunities for development, and greater difficulty for both those with and without cars to travel to jobs or other destinations or to take advantage of resources outside the neighborhood. The following points of access to and from the Northside are negatively impacted by the NHHIP.

1. Loss of Access to I-45 N and I-610 E & W from the Cavalcade Frontage Road

Currently, vehicles are able to access both I-45 N and I-610 E and W from the frontage road just north of Cavalcade St. It appears from the NHHIP video that both these entrances will be lost by the new construction, which will unduly restrict access from the Near Northside to these thoroughfares. The burdens of losing this access to both freeways from Cavalcade St. are significant:

- To enter I-45 N from anywhere in the Near Northside (north of the Quitman St. entrance/exit), residents will have to travel on the frontage road under the I-610 interchange all the way to the entrance between Airline and Tidwell at Bures St. - a distance of three or more miles. Alternatively, to have to backtrack to Quitman St. to access the Quitman St. entrance would significantly increase travel times and increase residential street traffic and congestion.
- To enter I-610 W from the Near Northside, residents will have to either (a) travel on the frontage road up to and under the I-45/I-610 interchange, turn west on the I-610 frontage road and travel to the entrance to I-610 W between North Main St. and Yale St OR (b) travel west on Cavalcade St. into the Greater Heights; turn north on North Main St. and proceed to the frontage road at I-610.

- To enter I-610 E from the Cavalcade frontage road, residents will have to travel north on the I-45 N frontage road; turn east on the I-610 E frontage road; cross the Metro Rail at Fulton St. (a lengthy light & congested intersection) as well as the light at Irvington St.; and proceed all the way to the entrance to I-610 E at Chapman St.

Clearly, this is a “disproportionately high and adverse . . . environmental effect . . . on minority populations and low-income populations.” (Executive Order 12898). Entrances from the Cavalcade frontage road to I-45 N and I-610 E & W must either be maintained or reconstructed.

2. Loss of Access to the Near Northside Due to Removal of the Entrance from I-610 E to Irvington St.

The only access to the Near Northside while driving east on I-610 is the exit from I-610 E to Irvington St. The NHHIP removes this entrance into the Near Northside further isolating the community.

3. Loss of Access from the Near Northside Due to Proposed Removal of the Entrance to I-45 N and I-610 W from Irvington St.

The existing entrance from Irvington St. to I-45 N and I-610 W will be removed by the NHHIP. Residents will thus be forced to travel much further on the frontage roads (a) north to the Buress St. entrance on I-45 N and (b) west to the entrance between North Main St. and Yale for access to I-160 W, which requires crossing the light rail at Fulton - an already congested crossing due to long lights waiting for the Red Line Metro trains.

- C. Isolation Due to Loss of Entrances into the Near Northside when Traveling South on I-45

The NHHIP removes exits into the Near Northside at Patton St. and North Main St. Other than the exit at the other end of the neighborhood at Quitman St., the only exit into the Near Northside left by the project is at Cavalcade. The removal of the Patton and North Main St. exits severely restricts access to the Near Northside, further isolating it.

- D. Isolation from Downtown

Access to downtown is critical for the economic development of the Near Northside. Access to downtown for cyclists and pedestrians is extremely limited. Many of the residents who bike and walk in the Near Northside do so out of necessity, rather than from a desire to exercise. Continuing isolation from downtown's jobs and city resources exacerbates environmental/economic injustice. To remediate this isolation, in Segment 3, a bike/pedestrian trail from the Near Northside into downtown should be constructed. Additionally, in conjunction with Metro, a pedestrian walkway should connect the University of Houston Downtown to the Burnett Transit Center.

- E. Isolation Will Cause Decreased Response Time by First Responders

All of the foregoing losses of access to the Near Northside will greatly and adversely impact the ability of first responders to travel to and from the neighborhood. Many of our first responders are headquartered outside the Near Northside. The nearest police station for the Houston Police Department (“HPD”) is the Central Division, located downtown. The nearest HPD substation is located in the Heights, across from I-45. The same is true for the Precinct 6 and Precinct 1 Constables who cover the Near Northside. Precinct 6 is headquartered in the East End on Canal St. and the Precinct 1 Constable offices downtown. The Near Northside does have a Houston Fire Department (“HFD”) station on Hogan, but any fires requiring more than its capacity, will require travel from outside the neighborhood. We are

equally concerned about the ability of any other first or disaster responders to access the Near Northside. Loss of access to the neighborhood by first responders clearly burdens this low-income, hispanic neighborhood.

F. Evacuation Concerns Due to Isolation of the Near Northside

Restricted egress from the Near Northside through the loss of entrances to I-45 and I-610 will be a further burden on the Near Northside low-income residents in the case of an evacuation (due to a hurricane or other disaster). Traffic will further back up inside the area and more time will be spent getting on the evacuation routes, thus inequitably decreasing the safety of Near Northside residents.

PART III

ADDITIONAL CONCERNS ABOUT
THE ADVERSE IMPACT OF THE NHHIP
ON THE NEAR NORTHSIDE

We have the following additional concerns that negatively affect the quality of life and safety in the Near Northside.

A. Safety Concern: Insufficient Distance from Cavalcade Exit (I-45N) to Make a Right Turn - Segment 2

The northbound exit from I-45 to Cavalcade St. enters the frontage road only 1/2 block from the corner of the frontage road and Cavalcade St. This is not enough distance for vehicles exiting I-45 N to cross the frontage road and move into the right lane to turn right at Cavalcade St. Either the northbound Cavalcade exit should be moved back closer to Patton or other accommodations should be made to address this safety concern.

B. Inequitable Displacement (Destruction) of Residences in the Near Northside

NHHIP calls for the destruction of a disproportionate number of residences (both single and multifamily) in the Near Northside. Compared with proposed destruction of residences in the Greater Heights across I-45, there are vastly more residences to be destroyed in the Near Northside. Such destruction results in a loss of affordable housing and low rent residences, both very necessary to a low-income neighborhood.

We also understand that there will be a significant loss of tax revenue and business income from NHHIP. We do not comment on the latter, since the Greater Northside Management District ("GMND") addresses commercial concerns and is responding to TxDOT with its own comments on the NHHIP.

C. Inequitable Blocking of the View of Downtown

The beautiful view of downtown from many areas in the Near Northside is one of the advantages of the neighborhood. These beautiful views will be blocked by NHHIP's new placement of I-10 and I-45 coming out of downtown, especially when going over the Red Line Metro Rail. Again, the project unduly burdens the disadvantaged residents of the Near Northside, by making the area less desirable for development and economic growth.

D. Design of Bridges at North Main, Quitman & Hogan Streets

The bridges in the Montrose/University area over I-69 are artistically and uniquely designed to draw attention to the area. The new bridges in the Near Northside over I-45 between I-610 and I-10 should have the same attention to artistic detail and design as those in the Montrose/University area. Not to create artistic bridges on this section of I-45 would be to discount a low-income neighborhood. TxDOT needs to work with the community to assure artistic creation and design of the North Main, Quitman and Hogan Street bridges comparable to that in the Montrose/University areas..

E. Loss of Connection between White Oak Bayou Bike Trail and Spring Street Bike Trail

As stated earlier, the bike trails in the Near Northside are critical to its residents because of the number of residents using their bikes out of necessity for transportation. The White Oak Bayou Bike Trail currently connects to the Spring Street Bike Trail and creates the ability for Near Northside cyclists to ride to the First Ward and its shopping areas (including Target) without endangering themselves on busy city streets. The NHHIP shows freeway (I-45) lanes on grade which would cut off the connection between these bike trails. The two trails in some way need to remain connected or be re-connected, possibly by elevating the grade lanes enough for bikers and pedestrians on the trail to pass underneath.

F. Connector to Bike Trails on Both Sides of Hogan St.

Two bike trails currently exist on both sides of Hogan St. As currently constructed, cyclists and pedestrians must leave the trail on one side of Hogan, go up to street level, cross Hogan and then proceed down to the bike trail on the other side. These two trails need to be connected in some fashion by a connector that joins the two trails together and increases cyclist and pedestrian safety.

G. Increased Semi Traffic on Local/Residential Streets

We understand that TxDOT proposes to purchase the Love's Truck Stop and surrounding area to create a retention pond. We want to underscore that this **MUST BE ACCOMPLISHED**. If Love's remains, the I-45 frontage road will become even more congested than it will due to the removal of entrances/exits to I-45. This increased congestion on the frontage road will further impair residents' access to I-45 N and S and to I-160 E and W. Moreover, increased frontage road congestion will result in semis seeking quicker routes through residential streets. In addition to the obvious undesirability of semis traveling down residential streets, such streets are not constructed to bear the burden of those heavy vehicles.

H. Retention Ponds Should Be Designed as Park Areas

There are a number of retention ponds created by the NHHIP. Because these are in an urban area and subject to urban blight (trash, overgrown plants, places for the homeless to congregate and kids to do drugs, etc.), these areas should be designed as park areas and TxDOT should work with the Houston Parks and Recreation Department to insure city maintenance and oversight of these parks. The last thing the Near Northside needs is more vacant land succumbing to urban blight.

I. Concerns about Noise and Air Pollution

We understand that TxDot plans to announce at a later date, plans to measure actual air pollution and to deal with increased noise pollution from the project. We are concerned about both types of pollution. Adding lanes to I-45 N and S will clearly increase traffic and congestion. Any plans or methods of dealing with these two forms of pollution must include the Near Northside as an area for which the increased noise and air pollution must be addressed.

J. Access to “CAP” Park Area and Nature of Frontage Roads

We understand that the plans for a park over the “CAP” on the depressed I-45 are dependent upon organizations other than TxDOT raising necessary funds to implement and execute plans for such a park.

1. If a “CAP” Park Is Not Created

If funds are not raised and a park is not created, we are concerned about the appearance and effect on quality of life in the neighborhood of a long cement “CAP” over the freeway. That expanse of cement will be ripe to become an urban dumping and graffiti zone. TxDOT should have plans in place for maintenance and clean up of the “CAP” unless and until a park is created.

2. If a “CAP” Park Is Created

If a park is created over the “cap”, we have significant concerns about pedestrian access to that area. There are no plans for bridges over the frontage roads or pedestrian crossings. It will be too dangerous for pedestrians (especially with kids and dogs) to cross the frontage roads to get to the park. The frontage roads should be redesigned so that instead of traffic-carrying thoroughfares that encourage high speeds, they are roads akin to residential streets where pedestrian crossings are expected and vehicle speeds are slower. (See next paragraph.)

3. New Design Philosophy for Frontage Roads

The design philosophy for all the frontage roads in urban areas, especially on I-45 between I-610 and I-10, should be to create roads with actual slow car speeds as well as the impression that high speeds (over 30 mph) are not possible/permissible; similar to the impression that one has driving on residential streets. NACTO’s Urban Street Design Guide should be used as a reference. Additionally, the frontage road design in this section of I-45 should conform to the City of Houston’s Infrastructure Design Manual (including, for example, 11 ft lanes, no right turn slip lanes, small curb radii, and protected bike lanes as called for in the City of Houston bike plan).

K. Addition of “Managed Lanes”

We oppose “managed lanes” (i.e., toll lanes for the purpose of faster travel) because we believe they further exacerbate economic inequality: if you are poor, you sit in traffic; if you are rich, you get to go fast.

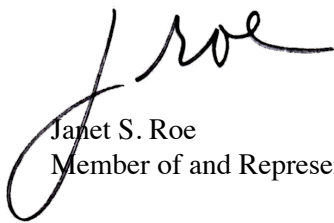
PART IV
SUMMARY

This concludes the concerns of the Super Neighborhood 51 Leadership Team. We understand that we have neither the time nor the expertise of TxDOT. We are, however, committed to and adamant about assuring that the Near Northside does not adversely suffer from the plans for, and ultimate construction of, the NHHIP. We strongly urge TxDOT to take another look at compliance with Executive Order 12898 and to reconsider the unjust economic and environmental impact of the NHHIP project on the Near Northside.

We will continue to work with the I-45 Coalition on any issues that the Greater Heights and the Near Northside have in common.

Thank you very much for the opportunity to address our concerns. Please do not hesitate to contact us with any questions, changes or follow-up.

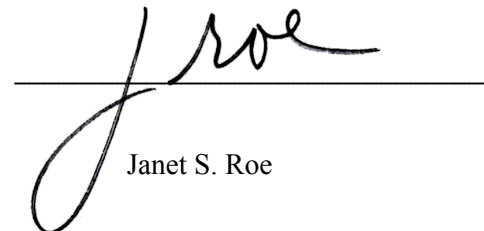
Sincerely,



Janet S. Roe
Member of and Representing the Super Neighborhood 51 Leadership Team

§201.811(a)(5) DISCLOSURE

Per Texas Transportation Code, §201.811(a)(5), I affirm that neither I am, nor to my knowledge any member of the Super Neighborhood 51 Leadership Team is: (1) employed by TxDOT; (2) doing Business with TxDOT; or (3) possibly benefiting monetarily from the project (NHHIP) or other item about which I am commenting in this letter.



Janet S. Roe

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