

# **Make I-45 Better Coalition**

## *Shaping the North Houston Highway Improvement Project*

Transportation infrastructure will continue to influence access to opportunity and the lives, including health and wellness, of communities in Texas. Every major infrastructure project using taxpayer dollars should be seen as an opportunity to improve the quality of life in the surrounding neighborhoods, rather than simply mitigating negative impacts. That's why the proposed North Houston Highway Improvement project, which would target IH-45 in Houston from Downtown and headed north to the Greenspoint area, and a small segment of IH-69 (formerly SH-59), plays such a critical role in Houston's future.

Although not fully funded to-date, the North Houston Highway Improvement Project is estimated to cost \$7-10 billion (exclusive of right-of-way purchases) to expand 25 miles of highway over a 10-year period. The Texas Department of Transportation's [goal](#) is to "provide a safer facility with additional capacity for projected demand by incorporating transit opportunities, travel demand strategies, and flexible operations." The project is presently undergoing required environmental review, which includes environmental justice and community impact assessments. The [Draft Environmental Impact Statement](#) acknowledges that the proposed project will "cause disproportionate and highly adverse impacts to minority or low-income populations." The [Draft Appendix F. Community Impact Assessment Technical Report](#) details how the expansion project requires additional right-of-way and will therefore displace: 168 single family homes; 1,067 multi-family homes (including 368 low-income units and 60 homeless veterans' units); and 331 businesses that employ 24,873 people.

The Make I-45 Better Coalition, a group of more than 20 organizations working to improve the North Houston Highway Improvement Project, aim to see a project that achieves these goals:

- Enhances connections between and within various existing communities.
- Reduces the number and rate of motor vehicle crashes to reduce the number of severe injuries and fatalities of people in vehicles, walking, and biking, both on the facility and on connecting local streets.
- Expands the opportunity for residents to safely walk within and between neighborhoods and to ride bicycles on a regionally connected network.
- Prioritizes and facilitates multimodal travel by incorporating local and regional transit services.
- Reduces historic flooding patterns and aggressively mitigates new flooding impacts, specifically building to the 500-year flood standard as a minimum.
- Prioritizes use of existing right-of-way and limits right-of-way acquisition when doing so would involve a regulatory taking of private property and design alternatives are feasible that do not require additional property.
- Preserves existing businesses and community resources while enhancing growth and economic development opportunities within neighborhoods adjacent to the project.
- Enhance parks and other open spaces as critical to physical and mental well-being of individuals, families, and communities.
- Protects and improves public health by improving air quality, especially for children adjacent to schools.

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# **Background on the Make I-45 Better Coalition**

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### **Background on addressing highway impacts:**

Since the 1950s, highway construction has disrupted low-income communities of color and creating physical barriers from opportunity. The impact of creating the interstate highway system was a primary justification of need for the [1994 Executive Order 12898, which directed](#) federal agencies to make part of their mission “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”. Following suit, [the U.S. Department of Transportation](#) and its sub-agency the Federal Highway Administration, in 1997 and 1998 respectively, issued subsequent orders to address environmental justice in transportation projects impacting minority populations and low-income populations. These orders, coupled with the National Environmental Policy Act of 1969 (NEPA), continue to guide the assessment of risks and benefits of proposed major transportation projects.

### **Background on the Make-I-45 Better Coalition:**

The Make I-45 Better Coalition’s mission is to improve the north highway corridor reconstruction and expansion project, known as the North Houston Highway Improvement Project (NHHIP). Some of the traffic the project is estimated to carry will have its destination inside the City of Houston, but much of it will have regional destinations. For this reason, it is critical that TxDOT delivers a project that leaves Houston in a better position than before, and takes care to ensure that the I-45 North expansion does not negatively impact the city in order to deliver benefits to surrounding areas.

The Coalition formed in 2017 in response to the NHHIP draft EIS, which failed to identify mitigation for park space, air quality, mobility across all modes, water run-off, and the significant impacts on low-income and minority communities. However, many Coalition member organizations were involved in the I-45 North process as far back as 1998.

The Make I-45 Coalition consists of 24 organizations:

- Air Alliance Houston
- Avenue Community Development Corporation
- Bayou City Waterkeeper
- BikeHouston
- Buffalo Bayou Partnership
- Eastwood Civic Association
- Freedmen’s Town Preservation Committee
- Friends of Woodland Park
- Galveston Bay Foundation
- Germantown Historic District
- Greater Heights Super Neighborhood 15
- Heritage Society
- Hermann Park Conservancy
- Houston Parks Board
- LINK Houston
- Montie Beach Civic Club
- Museum Super Neighborhood 66
- Scenic Houston
- Trees for Houston
- Washington Avenue Coalition/Memorial Park
- Super Neighborhood 22
- White Oak Bayou Association
- Winlow Place Civic Club
- Woodland Heights Civil Association

*Note: TxDOT provided the Coalition with draft written responses to comments submitted on July 27, 2017 on September 12, 2018 by certified mail. The Coalition reviewed the responses and found most to be insubstantial and “could be changed with release of the Final Environmental Impact Statement.”*

The Coalition, and related stakeholders, have actively engaged TxDOT:

- **July 27, 2017 Letter, Coalition to TxDOT (38 pages)**
  - Detailed, thoughtful description of concerns in nine focus areas:
    - Disproportionate impact to low-income communities
    - Impact to economic development opportunities
    - Impact to parks and recreation areas
    - Poorly conceived highway/urban interfaces
    - Noise impacts
    - Air quality impacts
    - Visual impacts
    - Impacts on walkability and cycling
    - Water quality and flooding impacts
- **August 18, 2017 Letter, Ten Elected Officials to TxDOT (1 page)**
  - Expressed explicit support for the previously submitted Coalition comments
    - Harris County Commissioner Rodney Ellis
    - Congresswoman Sheila Jackson-Lee
    - State Senator Sylvia Garcia
    - State Senator Boris Miles
    - State Representative Harold Dutton
    - State Representative Jessica Farrar
    - State Representative Jarvis Johnson
    - Houston City Council Member Dwight Boykins
    - Houston City Council Member Jack Christie
    - Houston City Council Member Ellen Cohen
- **Early 2018, Five Issue-Based Briefings by Coalition and Other Community Stakeholders to TxDOT Houston District**
  - Parks and open space
  - Visual impacts
  - Connectivity
  - Flooding and water quality
  - Air quality and environmental justice
- **April 13, 2018 Meeting of Coalition, TxDOT Houston, and Commissioner Ryan**
  - Coalition reviewed issue-based briefings at high-level and remaining concerns
  - Coalition wrote Impacts and Solutions Action Plan (8 pages)
  - TxDOT agreed to provide responses to comments for Coalition review
- **July 20, 2018 Letter, Coalition to TxDOT, RE: NHHIP – Technical Reports Review (8 pages, 5 exhibits)**
  - Detailed concerns about NEPA process and concerns about use of and content of draft technical reports:
    - Mobile Source Air Toxics Quantitative Technical Report
    - Draft Water Resources Technical Report
    - Draft Biological Resources Technical Report
    - Draft Waters of the United States Technical Report
  - Provided a Coalition “Impacts and Solutions Action Plan” (April 13, 2018)
  - Provided an “Impacts and Solutions PowerPoint”
  - Provided a “White Oak Bayou Preliminary Drainage Analysis” prepared by Huitt-Zollars, Inc., for the Houston Parks Board that was commissioned in support of work for the Coalition to Make I-45 Better (July 12, 2018)