December 3, 2020

Dear TXDOT,

Thank you for extending the comment period for the Final Environmental Impact Statement on the North Houston Highway Improvement Project. My District H constituents and I are grateful for the additional time to read and understand the report. Below are my comments and suggestions on a few issues I believe need special attention. I so believe that a tremendous opportunity exists right at this moment to get things “right” and hope you see it that way too. We can’t continue to operate and construct highways the way they’ve always been done. Thank you for your consideration of my suggestions.

**White Oak Bayou Greenway**

Despite the fact that the City of Houston has not “officially” designated the status of the White Oak Bayou Greenway trail as parkland, the local significance of this 100 foot wide strip that the City owns that contains the White Oak Bayou Greenway trail, is certainly both perceived and functions as a public park and recreation area by most everyone who interacts with it.

As stated on page 16 of the Coalition letter:

“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 and recreation areas, with hike/bike trails, along 150 miles from the city limits to UH Downtown where a federally funded TIGER project, . . . is connecting White Oak Bayou Greenway to Buffalo Bayou Park.”

The proposed highway renovation will absolutely have a significant detrimental impact on the White Oak Bayou Greenway. In addition to a net loss of 18 acres of open space (Comment 423), the visually appealing views of the Downtown skyline in this open public space will be lost. The proposed alignment removes the line of trees that blocks the view of I-10 as it exists
today, and the open field of native grasses and wildflowers that edge White Oak Bayou, would instead be covered by a significantly wider freeway with as many as seven very tall, elevated flyovers.

The statement made in the FEIS that, “The primary use of the White Oak Bayou greenway in the area of the NHHIP is for drainage and flood control” and that the “function of the White Oak Bayou greenway will not change.” (response to comment 423) is incorrect. All bayous in Houston function as part of our city’s drainage and flood control system, but that is not all they do. These green ribbons of parkland that connect Houston, are some of our best natural resources and geographical features, and deserve to be cherished as such. The White Oak Bayou Greenway is treasured by its surrounding communities, and its destruction is of great concern to them.

The DEIS was dismissive of the value of the White Oak Bayou Greenway, and so is the FEIS. TXDOT has a responsibility to address this issue and work with the stakeholders to mitigate the impact on the White Oak Bayou Greenway. That so many local people have thoughtfully weighed in and provided extensive documentation validating the high value of the White Oak Bayou Greenway as public recreational space, ought to be a persuasive enough reason for it to qualify for Constructive Use protections under Section 4(f) and be provided substantive mitigation.

Possible mitigation strategies

- TXDOT could squeeze down their design so that it would have less impact and minimize the harm done. This could be accomplished for instance, by narrowing shoulder widths, or how close bridges are to each other.

- To accommodate the 18 acres of green space that is lost at this location, TXDOT could provide replacement green space by improving the trail and connections on Little White Oak Bayou, from White Oak Bayou to Moody Park.

Lack of Local Studies

Despite being over an 8,700 page document, it was surprising to me that the report was missing some important information that should have been included in the FEIS. The report did not include any local traffic studies or safety analyses of surface streets. It’s a major concern that the impact of road closures on traffic within neighborhoods, or the safety of neighborhood streets was not addressed in the FEIS. Street closures and ramp configurations will have a significant impact on local traffic, as well as an impact on the safety of all road users on neighborhood streets.
Specifically within City Council District H, there is no recognition in the FEIS of how proposed changes would affect the movement or safety of vehicles, pedestrians or cyclists trying to travel through adjoining neighborhoods regarding these proposals:

- Eliminating the North Main Street Off-ramp
- Getting rid of Nance Street
- Closing North St to vehicles

An understanding of impacts on mobility within adjoining neighborhoods is important because if there are problems created by the construction of the highway that must be fixed, it would be fair for TXDOT to also be part of the solution. Any negative “unintended consequences” should not be the responsibility of the City alone. Traffic or safety studies around targeted areas of concern would serve us better now than later, so that cooperative agreements could be worked out ahead of time.

Sincerely,

Karla Cisneros
Council Member, District H