



CITY OF HOUSTON

Office of the Mayor

Sylvester Turner

Mayor

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December 8, 2020

Eliza Paul, P.E., District Engineer
Sue Theiss, Director of Project Development
TxDOT Houston District
7600 Washington Ave
Houston, TX 77007

Re: North Houston Highway Improvement Project

Dear Ms. Paul and Ms. Theiss,

Thank you for the opportunity to provide comments on the Final Environmental Impact Statement (FEIS) for the proposed North Houston Highway Improvement Project (NHHIP), and for granting my request for an extended review.

We are at a critical phase in this project's development. As required by the National Environmental Policy Act (NEPA), the FEIS must describe the project, document its impacts, and where possible, commit to their mitigation. Once a Record of Decision (ROD) is reached, it is the project described in the FEIS that TxDOT will have the authority to build. This is why my previous letter of May 12th and the following comments are critical for the advancement of this project.

Nearly two years ago, I assembled a Task Force of community and business leaders to assess on multiple levels the North Houston Highway Improvement Project. Over the course of the past year, the members of the Task Force also listened and shared their thoughts with other stakeholders in the City. Extensive community engagement through a Facility Group I established took place, and people have publicly voiced their concerns. Based on all of the above, I submitted to Laura Ryan of the Texas Transportation Commission my letter dated May 12, 2020, which I incorporate by reference herein, and re-affirm again. The goals described below remain priorities for the City of Houston.

- Limit right-of-way to the extent necessary to meet project goals.
- Serve and preserve the neighborhoods along the corridor while enhancing connectivity between neighborhoods.
- Provide long term capacity for all users of the roadway, including automobile, freight, and transit.
- Make travel safer for all road users.
- Reduce flooding on and off the freeway.
- Mitigate impacts to existing parks and greenspace while creating additional opportunity for greenspace.
- Ensure accessible evacuation routes.
- Strengthen Houston's economy.

This project can be transformational and can achieve the City's and TxDOT's objectives. The project, however, has shortcomings that must be addressed and impacts that must be further mitigated to maintain my support. The following must be refined:

- *Study a narrower footprint:* This is the central request of my May 12 letter with critical ramifications throughout the project, particularly in avoiding displacing residents and businesses. The City has identified designs that

potentially require less highway right-of-way in adjacent neighborhoods, including but not limited to Acres Home, Independence Heights, and Near Northside, and therefore result in displacement of fewer residents and businesses. Until the studies to refine the amount of right of way needed are complete, I ask we continue our dialogue on this very important subject.

- *Expand transit options, increase reliability, and support METRONext:* As transit is a key component in the region's long-term mobility, changes to METRO's network should improve transit service and be consistent with METRONext. TxDOT should mitigate impacts to current and planned transit operations, including projected passenger delays, facility access, and operational costs.
- *Retain and expand local street connectivity:* While TxDOT is improving connectivity in some areas, many areas remain uncertain and with connectivity potentially degraded, including the Wheeler area, the Warehouse District, and North Main. The City is eager to work with TxDOT to ensure regional travel is complemented by local access, including addressing the impacts which would be identified by local traffic studies.
- *Provide remaining responses:* Comments made by the City of Houston to two technical reports, including the Community Impacts Assessment and Cumulative Impacts Technical Report, were not responded to individually in the FEIS, as is required by NEPA.

To ensure ongoing efforts to guide the NHHIP project beyond the FEIS and ROD, the Houston-Galveston Area Council (H-GAC) Transportation Policy Council approved development of a Memorandum of Understanding (MOU) between the City, TxDOT, and various agencies. However, if the MOU refers back to the FEIS and ROD without addressing the concerns of my May 12th letter, it is difficult to see how this project moves forward with the City's support. We fully expect the MOU will define a process to develop refinements to mitigate the impacts documented in the FEIS, while maintaining consistency with the project's progress within the NEPA process:

- *Keep communities whole and ensure residents can relocate within neighborhoods:* TxDOT has committed to expanded relocation assistance with \$27 million to fund affordable housing in the corridor, and coordination is ongoing. TxDOT should increase its commitment to replacement of this housing stock at replacement value to capture the full need, and the City of Houston should participate in managing these funds. TxDOT should also develop a similar plan for relocating businesses that will be displaced, with the City of Houston also participate in managing these funds.
- *Clarify design of frontage lanes:* The FEIS white papers indicate that there will be separated bike lanes on frontage roads, but these are not shown in the schematic. In the ROD, TxDOT should affirm the design in the white papers as their commitment.
- *Reduce visual impacts along White Oak Bayou:* This key area, which is heavily used by pedestrians and cyclists from many surrounding communities, can be reconfigured to achieve a higher level of comfort and connection that better mitigates and is proportionate with the project's impact. The need to provide visual mitigation measures for this area has been acknowledged by TxDOT and the opportunity to properly address this must not be lost.

This MOU is critical for my continued support.

I have also provided a more detailed assessment of responses to City comments to the FEIS in the attached appendix.

I look forward to our further collaboration to address these issues and to make the NHHIP a project that truly benefits the City of Houston and the region.

Sincerely,



Sylvester Turner
Mayor

Enclosure: Comment Appendix

North Houston Highway Improvement Project
 Appendix to Mayor Turner’s comments
 on the Final Environmental Impact Statement



**PLANNING &
 DEVELOPMENT
 DEPARTMENT**

The central request of my May 12 letter is for TxDOT to **study a narrower footprint**. This request seeks to address a majority of the project’s impacts and implicates all of my remaining requests. I have separated my comments into four categories based on my May 12 letter and offer recommendations for next steps.

Property

Comment from May 12 Letter:

- Keep communities whole and ensure residents can relocate within neighborhoods

Comments	Recommendations
The FEIS commits \$27 million to support affordable housing. However, at typical construction costs of roughly \$290,000 per single family unit and \$175,000 per unit for multifamily, this is not sufficient to replace the 160 single family units and 433 units of private multifamily housing displaced, which would require approximately \$122 million.	TxDOT should increase its commitment to replacement of this housing stock at replacement value to capture the full need, and the City of Houston should participate in managing these funds. TxDOT should also develop a similar plan for relocating businesses that will be displaced, with the City of Houston also participate in managing these funds.
The FEIS commits to enhanced relocation assistance.	This commitment is appreciated. TxDOT should continue to coordinate with the community, and the City of Houston and its partners on how these programs are implemented.
The FEIS commits to relocating those who are houseless, but does not provide details.	The Coalition for the Homeless has submitted a plan to address the project’s impacts to houseless population impacted by the project. TxDOT should commit to partner and finance this plan.
The project will displace nonprofit affordable housing units at Midtown Terrace and Temenos Place, both with unique relocation challenges.	TxDOT should coordinate with the City of Houston and its partners and provide sufficient funding to ensure these facilities will be replaced and the residents can be relocated successfully.
The FEIS states that Clayton Homes and Kelly Village units will be replaced, but does not commit to how.	TxDOT should clarify how these units will be replaced or coordinate with City of Houston and its partners if additional approaches are needed.
The FEIS makes only minimal commitments to recognizing the history of the neighborhoods the project impacts.	TxDOT should work with the City of Houston and the local neighborhoods on a program to celebrate the local history and preserve community culture.

Flooding

Comment from May 12 Letter:

- Reduce flooding on and off freeway

Comments	Recommendations
The FEIS says the project has been revised to account for pre-Atlas 14 500-year floodplains and acknowledges availability of Atlas-14 rainfall data; however, it says TxDOT has not completed an updated analysis.	TxDOT should confirm these updated flooding studies based on Atlas-14 rainfall data will be completed and by what point in the project planning.
The FEIS says the project will replace the culverts at I-610, Patton, and Cavalcade (the three crossings of Little White Oak Bayou) with bridges, which could enable flood control projects that would reduce flood risks in surrounding neighborhoods.	This commitment is appreciated.
The FEIS says that depressed sections of highway will be designed for large rainfall events, but it does not identify specific design criteria.	TxDOT should coordinate with the City of Houston, Harris County Flood Control, and other partners to identify the appropriate criteria and design the sections.
The FEIS shows multiple detention basins, but no detail on design or functionality.	TxDOT should coordinate with the City of Houston, Harris County Flood Control, and other partners to design these detention basins.
The project crosses multiple tributaries of Little White Oak Bayou, which may be opportunities to improve neighborhood drainage.	TxDOT should coordinate with the City of Houston, Harris County Flood Control, and other partners to improve neighborhood drainage
The project involves major construction in the Warehouse District, which has significant local drainage issues that have not been assessed.	TxDOT should coordinate with the City of Houston, Harris County Flood Control, and other partners to assess and design drainage components for the Warehouse District.
The FEIS does not consider flood risks during construction.	TxDOT should coordinate with the City of Houston, Harris County Flood Control, and other partners to assess and design drainage components for construction periods.

Environment

Comments from May 12 Letter:

- Mitigate impacts to existing parks and greenspace while creating additional opportunity for green space.
- Improve freeway aesthetics

Comments	Recommendations
The FEIS is committing to an air monitoring program during construction.	This commitment is appreciated., though TxDOT should commit to additional locations.
The FEIS is committing to sound walls.	This commitment is appreciated.
The FEIS is committing to a weatherization and energy efficiency service program beginning in 2021 for “qualifying minority and/or low-income, single-family residences.”	This commitment is appreciated.
Roadways have significant impacts on stormwater quality through runoff of debris, sediment, and chemicals from the roadway.	TxDOT should commit to treatment mechanisms for stormwater.
The FEIS does not detail impacts on streams and does not consider overall stream function.	TxDOT should coordinate with City of Houston and other partners to evaluate overall stream functions and potential impacts.
The FEIS has eliminated most of the DEIS discussion of climate change impacts.	TxDOT should incorporate the DEIS’ discussion of climate change impacts.
The FEIS says that regional emissions will decline regardless of the project.	Future Conditions with the Project must be compared to Future Conditions Without the Project. TxDOT must mitigate the net impacts of these scenarios, instead of the overall Future Conditions.
The FEIS says that local increases in pollution cannot be analyzed.	Local pollution levels are readily able to be analyzed and should be for this project.
The FEIS acknowledges visual impacts on Bayou Greenways, but states the greenways are not designated parkland and therefore does not propose substantive mitigation.	TxDOT should coordinate with City of Houston and other partners to avoid visual impacts on the Bayou Greenways. Specifically, White Oak Bayou is heavily used by pedestrians and cyclists from many surrounding communities, can be reconfigured to achieve a level of comfort and connection commensurate to the impact. The need to provide visual mitigation measures for this area has been acknowledged by TxDOT and the opportunity to properly address this must not be lost.

Traffic and Connections

Comments from May 12 Letter:

- Design frontage roads and crossings as city streets
- Expand transit options, increase reliability, and support METRONext
- Retain and expand local street connectivity

Comments	Recommendations
The FEIS does not include a traffic study for impacts on local streets, does not discuss safety on neighborhood streets, and states that changes for on- and off-ramps (like not having a North Main ramp) would not affect neighborhood traffic	TxDOT should coordinate with City of Houston and other partners to conduct the local traffic studies that evaluate each of these items, and commit to funding any roadway improvements, whether within the project footprint or not, that are required to mitigate these traffic impacts.
The FEIS has numbers on reduction in crash frequency and severity — but no explanation of where the numbers come from.	TxDOT should provide their complete crash analysis.
The FEIS states that traffic volumes are projected to increase starting in 2014, which does not reflect actual traffic counts since 2014.	TxDOT should revisit their traffic projections based on data since 2014.
The FEIS schematics show a six-lane I-10 express lane structure connecting to a two-lane existing elevated HOV structure on I-10 with no explanation of the difference in lanes mid-air.	TxDOT should work with the City of Houston and project partners to complete this design component.
The FEIS says the highway will be designed for a hike-and-bike path along Little White Oak Bayou.	This commitment is appreciated. TxDOT should work with the City of Houston and project partners to complete this design component.
The FEIS says that TxDOT will attempt to accommodate a hike-and-bike path across Halls Bayou.	This commitment is appreciated. TxDOT should work with the City of Houston and project partners to complete this design component.
The FEIS white papers indicate that there will be separated bike lanes on frontage roads, but these are not shown in the schematic.	This commitment is appreciated. This design component should be consistent throughout the FEIS.
The FEIS states that feeder roads in Segment 3 (the Downtown area) and Segment 2 (I-10 to I-610) will be designed to City of Houston standards, but not in Segment 1 (north of I-610).	The commitments for Segments 3 and 2 are appreciated. TxDOT should work with the City of Houston and project partners to complete this design component for Segment 1.
The FEIS says the project will accommodate the Navigation/Commerce underpass.	This commitment is appreciated.
The FEIS says the project will accommodate the San Jacinto underpass.	This commitment is appreciated.
The FEIS says that the loss of the Polk Street connection from East Downtown and the East End to Downtown would be mitigated by a southbound road behind the George R. Brown Convention center and a new bike lane.	While this commitment is appreciated, TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design, and commit to funding any roadway improvements, whether within the project footprint or not, that are required to mitigate these traffic impacts.”
The FEIS says that keeping Runnels in place is not feasible.	TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design.

Comments	Recommendations
The FEIS says that Rothwell will “replace Nance St. as the connection to Jensen” in the Warehouse District.	TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design.
The FEIS schematics do not show extending San Jacinto to connect to the freeway.	TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design.
The FEIS does not propose any new connection to mitigate the removal of the North Street Overpass.	TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design.
The FEIS proposes to remove a block of Blodgett Street without a replacement.	TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design.
The schematics continue to show Cleburne being disconnected at the freeway.	TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design.
The new westbound frontage road along I-69 from north of Alabama to Caroline creates complex traffic patterns that could have significant impacts on neighborhoods; this local traffic circulation is not analyzed and mitigations are not identified	TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design.
The project leaves local streets disconnected in the southeast corner of Midtown.	TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design.
At Webster Street, the proposed design interrupts local street connectivity and creates a possibly unsafe merge condition.	TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design.
The connection from Leeland to Bell will be eliminated with the proposed design.	TxDOT should coordinate with the City of Houston and project partners on the local traffic studies needed to confirm impacts from this design.
The FEIS claims there will be no impacts to transit service but does not provide mitigation for many impacted conditions.	The City of Houston defers to METRO, the City’s transit provider, on all transit-related impacts and recommends TxDOT coordinate with METRO on these components, fully document all transit impacts, and modify the design as required to mitigate the impacts.