



CITY OF HOUSTON

Office of the Mayor

Sylvester Turner

Mayor

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December 9, 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:

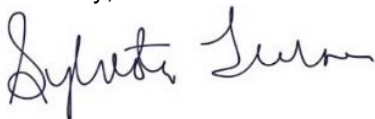
- *Keep communities whole and ensure residents can relocate within neighborhoods:* TxDOT has committed to expanded relocation assistance with \$27 million to fund affordable housing in the corridor, and coordination is ongoing. TxDOT should increase its commitment to replacement of this housing stock 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

Dave P. Martin

Dave Martin
Mayor Pro-Tem

Amy Peck

Amy Peck
Council Member, District A

Abbie Kamin

Abbie Kamin
Council Member, District C

Tiffany Thomas

Tiffany Thomas
Council Member, District F

Robert Gallegos

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Council Member, District I

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Council Member, At-Large 2

Letitia Plummer

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Edward Pollard

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Sallie Alcorn

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Enclosure: Comment Appendix