



City of Pearland comments regarding the proposal from TxDOT to add the SH35 Corridor from I-610 to SH-99 to the H-GAC Regional Transportation Plan (RTP)

April 27, 2021

On April 26, 2021, TxDOT representatives provided a briefing on the SH35 Corridor (I-610 to Future SH99) to the Pearland City Council. The Council provided input and discussion on the proposed freeway. The general sense of the discuss was there was **not** a need for the project locally or regionally and that **the detrimental impacts to the community outweigh any mobility benefits.**

Based on Council and staff input, the City of Pearland is submitting the following comments regarding the proposed RTP Amendment that will add the SH35 Corridor project to the RTP:

1. **An elevated freeway is not an option for Pearland** along the existing BNSF rail corridor due to its impacts on:
 - a. **Existing Development** – The SH35 and Mykawa Road corridors are high value employment and investment areas with room for additional growth. The freeway will cause permanent economic disruption by eliminating much of this value and negatively impacting future growth.
 - b. **Aesthetics** – Pearland has long-range plans for the SH35 corridor and revitalization of the Old Town area already underway that are not compatible with and will be diminished in value with an adjacent freeway.
 - c. **Long term detrimental impacts** – Long term impacts to other communities that were divided by similar freeways after the areas were developed irreparably ruptured those communities (see communities divided by the Hardy Tollroad, SH59, I-10, etc.). We do not want that for Pearland. The benefits are for communities to the south while the detrimental impacts to Pearland are significant and unlikely to be overcome
 - d. **Noise Pollution** – The City of Pearland worked with BNSF Railroad for a decade and spent over \$40M building three overpasses and three at-grade intersection with supplemental safety measures to implement a “Quiet Zone” throughout Pearland where the trains do not use their horns within our community. A freeway, elevated or not, will bring *constant* noise levels approaching the volume of train horns.
2. **Pearland questions the need for a freeway at all (elevated or other) and the assumptions the growth projections are based upon are outdated and have flaws, such as:**
 - a. SH35 Corridor where it has already been expanded to six lanes in Pearland (BW8 to FM518) does not have am or pm peak capacity of Level of Service issues.
 - b. The need for the freeway is **based on the antiquated hub and spoke Central Business District (CBD) model**. This model served the transportation needs of outlying areas reaching the CBD to the detriment of the communities it divided. The Houston metro area today has many business districts and destinations and

is not in need of an additional freeway into downtown, especially where the necessary right-of-way was not preserved. Additionally, many corporations located in Houston are moving permanently to a work from home model in response to the COVID-19 pandemic and the evolving real estate market downtown.

- c. The **growth percentages (2018-2045) to the south of Pearland are flawed and skewed due to the low existing population numbers in the Hastings Oilfield area**. *Pearland staff requested TxDOT provide actual number of population growth and to present that data to City Council however only the percentages were used.*
 - d. The growth **projections do not consider the changing commuting patterns and the future of work** for 2045. Where does H-GAC get their data on where people work? They should be engaging with developers to have a better understanding of where people will be working in the future and therefore be able to better determine where they will live and the resulting commuting patterns.
 - e. The much **better option for connecting the SH35 Bypass in Alvin to the freeway system is completing SH99 to I-45**. The benefits are a *shorter route* (less costs) and the *right-of-way has been preserved or traverses open land* with little to no development minimizing the disruptions to businesses and residents.
3. **Existing Road Capacity Needs** – Pearland has multiple existing State roadways that as of *today*, not 25 years into the future, **have a lack of capacity, very high congestion, and safety issues**. These roadways were identified in the **Northern Brazoria County/Pearland Subregional Planning Initiative (SPI)** conducted by H-GAC themselves to be the *highest priority roadways in our area*. The SPI include Pearland, Manvel, Iowa Colony, and Alvin. **TxDOT should prioritize the use of their limited resources to address the corridors that have existing needs as identified in the SPI** over a future freeway that has no clear sub-regional or regional need, only considers the needs of one community, has no available corridor to be built, and was not a priority in the SPI.
- a. **FM518 Widening (SH288 to FM865 (Cullen Pkwy)** – No. 1 priority from the SPI. TxDOT has started design and land acquisition. Construction is scheduled to start in 2025. Need to ensure this project is fully funded and stays on schedule. It has already slipped from 2024.
 - b. **SH35 Widening (FM518 to Alvin)** – No. 2 priority from the SPI. This undivided high-speed corridor has the **most significant safety issues in Brazoria County**. *No planning, design, or environmental clearance efforts have been started by TxDOT.*
 - c. **FM518 Widening (FM865 to SH35)** – No. 5 priority from the SPI. TxDOT has started the environmental work and design but *construction funds have not been allocated*.
 - d. **FM518 Widening (McLean to Walnut)** – This short segment of FM518 is part of the No. 5 priority from the SPI but **has been left out of the TxDOT project and environmental document** due to the existing narrow right-of-way. The segment *includes the intersection with SH35 and needs to be further evaluated to see if a one-way pair option is viable by using Walnut Street or other options should be considered*. Instead of incorporating this analysis into the overall FM518 project,

TxDOT has left this evaluation to the City. The City has requested funds from H-GAC for the analysis.

- e. **FM518 Widening (SH35 to Friendswood)** – Although not identified and studied at the time the SPI was conducted, **this segment of FM518 continues to experience high commercial/retail growth leading to traffic volumes surpassing volumes on the No. 5 SPI priority segment** of FM518 between FM865 and SH35. *No planning, design, or environmental clearance efforts have been started by TxDOT.*
 - f. **FM1128 Widening (FM518 to SH6)** – No. 4 & 6 priorities from the SPI. This corridor will eventually connect SH6 to BW8, when the City completes the segment north of FM518. *No planning, design, or environmental clearance efforts have been started by TxDOT for the FM518 to SH6 segment.*
- 4. There will be little to **no Evacuation Route benefits** to Pearland, communities to the south, or the region because the SH35 corridor will just put evacuation traffic onto existing routes that are already inadequate for evacuation (BW8, I-610, I-45)
 - 5. **Crash Trends** – The freeway will not solve the crash trends on the existing SH35 or Mykawa Road. To address, TxDOT should widen and implement safety measures in the areas with the highest crash rates. Where SH35 has been widened and safety measures have been implemented in Pearland, the crash rates are relatively low.