January 27, 2020

TXDOT Houston District Office  
Director of Project Development  
P.O. 1386, Houston, TX 77251-1386

RE: Draft NHHIP Community Impacts Assessment

To the Director of Project Development:

The City of Houston is asking itself if it is better off with or without the NHHIP Project. As it currently stands, the negatives of the NHHIP outweigh the positives for residents and property owners in District H. While the project would include improvements to safety, drainage, and transit capacity, the benefits are not spread equitably and come at the expense of minority neighborhoods. These already disadvantaged communities will bear the brunt of the negative impacts of displacement and a whole range of quality of life issues. It is incumbent on Houston to protect our self-interest against a proposed plan that is fundamentally unfair and primarily benefits those living north of Beltway 8. The reconstruction of I-45 presents a once in a lifetime opportunity to set a transportation vision for Houston that values people, neighborhoods, and transit over cars.

Flawed Arguments

1. Traffic Safety
One of the issues many people are struggling with is regarding safety. TXDOT’s argument for widening the highway to improve safety pits business and homeowners facing imminent domain of their property against statistics citing correlations between highway safety measures and projected death rates. The problem is that this argument is incomplete and does not tell the whole story. Instead of only looking at highway safety, it is important to view traffic safety comprehensively and to consider all of our roadways. Our highways are already the safest roadways that we have. If we are to truly address overall fatalities and improve roadway safety, a much higher return on investment could come from improvement to the safety of our city streets. ‘TXDOT’ stands for the Texas Department of Transportation, it is not the Texas Department of Highways, and they have the flexibility to address roadway safety in a much broader way than they currently do.
2. **Congestion**
TXDOT’s stated goal of reducing congestion can no longer simply rely on adding more lanes to accommodate additional traffic. The reality is that adding lanes to provide more capacity is only a temporary “improvement” and that congestion inevitably increases as additional vehicles take advantage of added capacity. We don’t need to add capacity at the expense of neighborhoods. A better and more forward-looking strategy is to embrace congestion and make it work for us to create more demand for mass transit. Not doing so simply pushes the decisions required for better public transportation options, further into the future. While uncomfortable initially, grappling with alternative ways to address congestion would be transformative for our city. Accepting congestion as a strategy actually discourages the number of cars driving from the Woodlands to Downtown. By making it harder for people to drive their cars, we will in fact reduce the number of cars that pass through the city and will also reduce carbon emissions. Including two transit lanes in the reconstruction of I-45 and building in flexibility for future technologies is a good idea. Additionally, solutions that divert some of the traffic away from I-45 to other roadways must be developed. We should be measuring capacity in terms of people, not cars, and asking how we can use that capacity to do the most good.

3. **Local Control**
There needs to be a total shift in how the city thinks about transportation projects. It is time for the city to embrace this role, take the lead and set the agenda for this and future transportation projects. Local control would truly make a difference in ensuring a successful outcome for the NHHIP Project, but to do so requires cooperation from the State in sharing funding and decision making on how transportation dollars are spent. TXDOT should be paying for this. Doing so would be a better investment of TXDOT dollars by funding improvements to local roads, pedestrian accessibility, and transit systems.

4. **Regionalism**
While it is important for Houston and Harris County to think regionally and to work collaboratively with our neighboring municipalities, Houston needs to be more proactive and more selfish in making decisions that are good for us as a city. The destructive impact of the proposed NHHIP Project on our neighborhoods in Segments 1 and 2 is unacceptable.

5. **Flooding**
When Houston’s highways were first constructed in the 1950’s and 1960’s, there was little awareness of how the highway construction would create flooding problems for neighboring communities. Addressing structural flooding created by the highways and correcting errors made more than half a century ago is one of the most important goals that the NHHIP must accomplish.
6. Inequity between Segment 3 and Segments 1&2
Most residents and business owners in District H are not onboard with Segments 1&2. Segment 3 had years of robust engagement and planning on the part of interested and well-funded Downtown parties, resulting in a project that while it has its drawbacks, also provides some strong benefits to the surrounding neighborhoods. The third Segment includes changes that re-establish disconnected communities with new cap parks and provides opportunities to capitalize on the public acquisition of expensive downtown property. Most importantly, the project allows for significant improvements to drainage downtown through the construction of the North Canal. Segment 3 should be built as a stand-alone project, while Segments 1 & 2 should be sent back to the drawing board.

7. Environment
Widening I-45 and bringing the highway even closer to homes and schools in the neighborhoods will worsen the health outcomes of the residents there. The profound negative impact of the existing highways on air quality, and the resulting poor health of residents in the surrounding neighborhoods is already well documented. It is not worth it.

8. Disadvantaged Communities
Despite being overwhelming in size, the Technical Reports are not required to and ultimately do not address the fact that the NHHIP disproportionately impacts minority and low-income populations. The highways were originally located through these communities more than half a century ago and have already had a detrimental effect on the residents and their quality of life. The question is how to minimize the impact of the highway reconstruction on disadvantaged neighborhoods when the location of highways has already been set? It is hard to imagine that this project would look the same if it passed through a more affluent part of town. If there is displacement, it is critical that there must be a housing strategy that provides realistic options for people to remain in the same neighborhood if they desire.

Thank you for your consideration of these comments.

Sincerely,

Karla Cisneros
Houston City Council Member, District H