February 7th, 2020

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

The North Houston Highway Improvement Project (NHHIP) represents more than a $7 billion (plus) investment in highway infrastructure. The NHHIP is a statement of values and an investment in a particular vision for the future of Houston—a future that, in my opinion, is antagonistic to the vision we at the City are working to create.

The project has been billed as having the potential to be transformative for the region through increased connectivity (to a highway), favorably impacting traffic congestion (yet it will induce demand for more cars and sprawl) and improving drainage and detention capacity. The project no doubt has its benefits, but what Houstonians are being asked to consider is whether or not those benefits outstrip the negative impacts associated with the project.

Having examined both of TxDOT’s technical draft reports, I am left to conclude that the benefits do, in fact significantly outweigh the project’s negative externalities—but only for suburbanites not living in the City. Who we ask to bear the negative costs of a given project says more about who we are as a collective than the project does itself—no matter its benefits.

The project, in its current form, asks disproportionately lower-income, brown, and black populations to bear the brunt of the adverse effects of the highway’s expansion. What is most troubling about this trade-off is that it is in no way a break from practices of the past. This country, this region, and this highway in particular, has a rich history of dislocating lower-income populations in favor of facilities that will benefit disproportionately wealthier populations in the sub- and exurbs.

Much has been said about the positive mitigation efforts TxDOT has planned for the communities impacted by the highway’s expansion. It has been said TxDOT is doing more than it has ever done by way of mitigation—more than any project previously. However, given the once and future legacy of this highway’s destruction of historic communities, merely doing just above the federally required minimal mitigation is nothing to be applauded.

For me to support a project that displaces 1,079 residential units (many occupied by seniors), 344 businesses, and eliminates potentially 4,840 to 13,713 jobs—to say nothing of its erosions to the City’s tax base—the NHHIP will have to concern itself with more than federally required mitigation. The NHHIP will have to concern itself with more than equity. For me to support this project, the NHHIP will have to concern itself with justice for those communities and people most heavily impacted.
It may very well be equitable for TxDOT to offer residents of Independence Heights fair market value for the home they will be losing to a highway. Still, given the context of newly constructed homes causing the median home price to rise north of 200% in that neighborhood over the last 20 years, it is certainly not just to do so. We will be removing them not only from their physical home, but a community they may no longer be able to afford to call home.

It may be equitable to build new housing units for the 296 displaced families currently living at Clayton Homes. Still, if those units are rebuilt using the same failed strategy of concentrating poverty in lifeless housing tracts, it will not be just to do so.

I am publicly commenting on this project to ask TxDOT to do two things. First, take the current designs for Segments 1 and 2 back to the drawing board. Their footprints are too large and impact too many of the same people we have consistently asked to shoulder the burdens of our car-centric needs. Second, I’m asking TxDOT to incorporate three specific alternative recommendations Mayor Turner’s facilitation group, led by the Planning Department and Huitt-Zollars, has put forth in the last week:

- Alternative 01.3 – Fit the NHHIP in Existing Right-of-way
- Alternative 04.3 – Additional BRT Stations, Local BRT along the Airline Route
- Alternative 25.1 – Comprehensive Housing Program

Together, these measures lend a more just quality to the project. They were conceived after months of detailed community engagement and, at present, reflect a clearer vision of the future Houstonians are calling for: transit-centric modes of transportation and development, housing within reach of its most vulnerable citizens, and innovative uses of existing rights-of-way.

Thank you for your consideration of these comments.