

TPC MOU Comment(s) December 11, 2020

1. Dear TxDot:

Your I-45 North project (NHHIP) will only realize half its claimed congestion benefits. This is because it takes total credit for the Hardy Downtown Connector, a project not even in your budget. The Hardy project, already underway, will (finally) connect Spring area traffic to downtown & I-69 with two lanes both ways - the very same destinations and number of lanes as NHHIP. In other words, half the congestion relief will be due to the Hardy and only half to the NHHIP.

TxDot devotes many statements to what we already know - traffic is bad, blah, blah - and almost nothing to how much, exactly, your project will improve it. When you do make a claim, you play a little shell game. For example, you say the trip from Cross timbers to the convention center takes up to 77 minutes and after your project it will take only 19 minutes. But this 19-minute trip will actually be due to the Hardy Connector, which will connect Cross timbers directly to the convention center at I-69. The unshelled truth? Hardy savings: 58 minutes; NHHIP savings: zero.

You also observe that congestion on 610 loop east of I-45 now slows to 12 mph. Well, of course, every commuter on the Hardy has to exit on 610 to get downtown and back. Long before NHHIP is finished those commuters, and many others from north I-45, will be flying over 610 and the problem will have been solved - solved by the Hardy Downtown Connector, not the I-45 expansion.

Since you cannot now clearly and truthfully describe the incremental congestion benefits of NHHIP - benefits beyond what the Hardy Connector provides - you must delay construction until the Connector is finished. Only then might we get a credible projection of NHHIP benefit and make a good decision about proceeding.

2. The NHHIP devotes many pages about how bad traffic is now but nearly nothing about how much it will improve when the project is finished. "Trust me" is not good enough. For this kind of money and years of construction agony, customers deserve better than a pig in a poke, want to know what traffic will be like, in numbers, when it's all over.

There are a few claims made: e.g., the trip from Cross timbers to the convention center now takes up to 77 minutes and after NHHIP it will take only 19 minutes. But that 19-minute trip will actually be possible on the Hardy Downtown Connector, which will be finished long before NHHIP.

It also predicts that congestion on 610 Loop east of I-45, which now slows to 12 mph, will improve to over 50 mph. Well, of course it's slow now. Every commuter on the Hardy has to exit on 610 to get downtown and back. However, long before NHHIP is finished those commuters, and many others from north I-45, will be flying over 610 and the 12-mph problem will have been solved, solved once again by the Hardy Connector, not the I-45 expansion.

In thousands of pages TxDot has not credibly estimated *the most important part of its project*, the congestion benefit. It should not proceed until it can, which is after the Hardy Connector is finished. Only then can we get a credible projection of incremental NHHIP benefit and make a good decision about proceeding.

3. The FEIS is woefully inaccurate in its description of the NHHIP benefits. It uses as a base "Do Nothing" case, traffic patterns from a 20-year-old H-GAC report designed to support Metro. Back then the Hardy was a ghost road and contributed little to solving congestion. Finally, under construction, the Hardy Downtown Connector project will make a huge contribution, carrying two lanes of traffic both ways, a contribution wrongfully claimed by TxDOT.

For example, NHHIP claims that the trip from Cross timbers to the convention center now takes up to 77 minutes and after NHHIP it will take only 19 minutes. Quite overlooked is that the 19-minute trip will actually be possible long before NHHIP is completed, on the Hardy Downtown Connector.

It also predicts that congestion on 610 Loop east of I-45, which now slows to 12 mph, will improve to over 50 mph. Well, of course it's slow now. Every commuter on the Hardy has to exit on 610 to get downtown and back. Fortunately, long before NHHIP is finished those commuters and thousands of others from north I-45 will be flying over 610 and the 12-mph problem will have been solved, solved once again by the Hardy Connector, not the I-45 expansion.

In thousands of pages TxDot has not credibly estimated the most important part of its project, the congestion benefit. The Hardy connector, which is not even in the NHHIP budget, will bring just as many lanes downtown as the I-45 expansion will. To make its own project look good, TxDot claims all that benefit for itself.

This is not how the project should be evaluated. NHHIP should not proceed until after the Hardy Connector is finished. Only then can we get a credible projection of its true incremental benefit potential and make a good decision about proceeding.

4. Fellow Houstonians

TxDot grossly overstates the benefits of its NHHIP project. It uses as a base "Do Nothing" case, traffic patterns from a 20-year-old H-GAC report designed to support Metro. Back then the Hardy was a ghost road, contributing little to solving congestion. Now finally under construction, the Hardy Downtown Connector project will actually make a huge contribution - carrying two lanes of traffic both ways - a contribution wrongfully claimed by TxDOT.

For example, the FEIS claims that the trip from Cross timbers to the convention center now takes up to 77 minutes and after NHHIP it will take only 19 minutes. Quite ignored is that the 19-minute trip will actually be possible on the Hardy, long before NHHIP is completed.

It also predicts that congestion on 610 Loop east of I-45, which now slows to 12 mph, will

improve to over 50 mph. Well, of course it's slow now. Every commuter on the Hardy has to exit on 610 to get downtown and back. Fortunately, long before NHHIP is finished those commuters and thousands of others from north I-45 will be flying over 610 and the 12-mph problem will have been solved, solved once again by the Hardy Connector, not the I-45 expansion.

In thousands of pages TxDot has not credibly estimated the most important part of its project, the congestion benefit. It does not recognize that the Hardy connector, which is not even in the NHHIP budget, will bring just as many lanes and just as much peak traffic downtown as the I-45 expansion will. To make its own project look good, TxDot claims all that benefit for itself.

This is not how the project should be evaluated. NHHIP should not proceed until after the Hardy Connector is finished. Only then can we get a credible projection of its true incremental benefit potential and make a good decision about proceeding.