



October 16, 2023

Ms. Susan Theiss  
Texas Department of Transportation  
TxDOT Houston District Office  
Advanced Project Development Director  
P.O. Box 1386  
Houston, TX 77251-1386

Re: **CSJ: 0912-22-536 I-45N Planning and Environmental Linkages (PEL) Study**

Dear Ms. Theiss:

The City of Houston ("the City") appreciates the opportunity to submit comments to CSJ 0912-22-536, I-45N Planning and Environmental Linkages (PEL) Study. The City has previously submitted comments on this project to TxDOT in a letter dated February 6, 2023, and reiterates concerns about the project footprint, impact on the surrounding community, and projected benefits. The most recent virtual and in-person public meetings, held to announce and invite further comment on the recommended alternative, is welcomed.

### **Goals aligning with Objectives**

At the outset of the PEL study, TxDOT has consistently noted that improved safety for the subject corridor is one of the primary factors for selecting the final preferred alternative. A review of the presentation script reveals that safety does not rank on the list of this PEL study's goals and objectives. It is unknown whether stakeholders and the public understood safety was a goal and whether these goals were articulated clearly and continuously throughout the study period. This can be problematic for travelers using all modes, but especially where pedestrian and bicyclist safety measures are not adequately embedded in the project. A thoughtful goal/objectives analysis of the preferred alternative could benefit from continually reviewing the project's various iterations and how the public informs the project.

### **Preferred Alternative: Elevated Managed Lanes**

The preferred alternative appears to address some of the public participants' concerns regarding minimizing right-of-way acquisition. While shared-use paths on either side of the I-45 North are helpful, 3-lane frontage roads would contradict TxDOT's NHHIP efforts to design frontage roads as City streets. Instead, larger shared-use paths, a safety buffer, and planting strips can serve to reallocate space along the right-of-way that better enhances the surrounding community. We also note that there is potential to "increase storage length of exclusive turn lanes" mentioned in the public meeting's script. Opportunities to add midblock crossings in areas of high pedestrian activity, evaluate access management along frontage roads, and properly balance signal timing, can help produce safer frontage roads. It is also noted that access to the Kuykendahl transit facility will be improved, but there is no reference as to how or in what manner. Considering this facility will be used by those utilizing multiple modes, we hope TxDOT evaluates turning



movements into the facility that slow excessive speeds, adds curb bump-outs where appropriate, and implements more visible signage and pavement markings to appropriately manage vehicle speeds along frontage roads to be safe for all users. Regarding the elevated managed lanes themselves, we highly encourage TxDOT's planners to include Houston/Harris County transit agencies in discussions to better utilize high-capacity transit along these lanes. Additionally, regarding projected plans to grade-separate the interchange at Beltway 8 and I-45 North, TxDOT should incorporate feedback from robust stakeholder discussions around incorporating light rail and transit options to complement bicycle and pedestrian movements in the Greenspoint area. With substantial regional population growth projected in the next 20 years, induced demand has the potential to remove any benefits achieved through this preferred alternative and would force stakeholders to again revisit solutions.

We are encouraged to see that TxDOT's planning team has included the City's concerns in this project's new iteration. We look forward to continuing our partnership in this regard.

Sincerely,

DocuSigned by:

*Veronica Davis*

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Veronica O. Davis, P.E.

Director

Transportation and Drainage Operations

Houston Public Works