

LINK HOUSTON

October 1, 2020

Dear Chair Lewis:

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Oni K. Blair

We appreciate your efforts and the efforts of many of the participants and staff to maintain a transparent process in the development of the Memorandum of Understanding for the North Houston Highway Improvement Project by the parties named by the H-GAC Transportation Policy Council Chair. We write to provide our overarching comments on the development of the MOU.

Chief among the stated purposes of the proposed MOU is to formalize the parties' commitment to common goals for the NHHIP.

As we have stated previously at TPC meetings, it is important that a future agreement prioritizes the public interest of people and businesses directly impacted – those people living and working adjacent to the project corridor – during construction and for the 50+ year lifespan of whatever is built. Therefore, the goals in this MOU should clearly reflect the parties' commitment to address the concerns identified by Mayor Sylvester Turner in his [May 2020 letter](#) to Texas Transportation Commissioner Laura Ryan, which reflect community members' concerns about the project:

- Address outstanding adverse impacts outlined in the Mayor's document, especially displacement of people and businesses.
- Include a decision to halt or withdraw funding should the project fail to address the very real concerns of residents and business owners who live adjacent to the project corridor.
- Provide ongoing and meaningful engagement with the public.
- Separate completion of the NEPA process for Segment 3 from that for Segments 1 & 2.

Additionally, many of the parties to the agreement have commitments to equity, and an MOU should expressly state equity as a cross-cutting goal.

Finally, the document at this stage does not appear to address "capacity" in a way consistent with the intention of many public comments on the NHHIP. Many of the public comments reflect a concern about capacity for people traveling on the I-45 North corridor or for high-capacity transit. While the MOU negotiation has attempted to address the need for capacity, the present draft does not reflect the needs and demands for people traveling across all modes.

The overall document still reads with a lens towards prioritizing vehicle over people capacity. Pursuing an NHHIP design that prioritizes people capacity via all travel modes will future the project, especially considering present circumstances:

- Traffic volumes on I-45 North have declined since 2010 in Segments 1 and 2.
- COVID-19 workplace impacts are changing the flexibility of work locations in ways that will persist to some degree into the future.
- Future vehicle technologies, including partial or full autonomy, will facilitate safety improvements while increasing the density and cohesive movement of more vehicles in same amount of physical space.



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- Traffic volumes, trips taken, and the resulting congestion are driven by human decision making. Clear bodies of research and local observation of historical projects corroborate the fundamental law of induced and latent demand – vehicles at peak hour fill roadways based on human decisions. Traffic/congestion modeling is a [flawed science](#), and capacity is better thought of as a policy decision related to other quality-of-life goals that are more attainable.

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It is imperative that the TPC working group negotiate in good faith to address the real concerns that numerous stakeholders and residents have identified concerning the inequitable consequences of the proposed NHHIP on Black and Latinx communities, especially displacing people, businesses, and community resources.

Sincerely,



Oni K. Blair
Executive Director

