



Public comments - NHHIP MOU Meeting 10/1/20

By Harrison Humphreys, AAH Transportation Policy Advocate

Good afternoon working group members, staff. My name is Harrison Humphreys and I am with Air Alliance Houston. I'd like to start off by saying I appreciate the time and work y'all have put into deliberating this document. And while I recognize you're close to finalizing it, I feel it's important to make some pertinent points given the release of the FEIS last week and important to note that our organization does not feel the MOU sufficiently addresses core issues of the project design.

One of the main objections our organization held with the Draft Environmental Impact Statement was the lack of adequate air quality analysis. Notably, TxDOT's analysis concludes that Mobile Source Air Toxic levels will remain at an acceptable level on a *regional* basis; they did not analyze local impacts on the neighborhoods directly adjacent to the highway. Additionally, TxDOT makes the argument that congestion relief *could* offset increases in pollution levels brought on by highway widening, assuming long-term congestion relief will be maintained. Which, as has been discussed several times in this group, is doubtful at best. Finally, they also assume continued improving fuel efficiency standards based on the Obama-era CAFE standards, which the Trump administration is in the process of repealing.

The FEIS essentially relies on the same arguments. TxDOT doubles down on nearly all of their original analyses. Their Mobile Source Air Toxic claims are still based on a regional analysis, disregarding localized impacts. TxDOT continues to rely on the promise of increasing fuel efficiency to justify a huge increase of VMT. They also continue to posit long-term congestion relief as an indisputable fact, again concluding that adding more vehicles will not harm air quality because they assuredly will be going faster.

The point I'm trying to make today is that the project as it is presented in the FEIS is deeply flawed; air quality is just one aspect of it. And I'm sure I don't have to repeat this, but it does not in any way reflect the wants and asks of the communities most affected by it. And, unfortunately, we do not feel the current MOU document provides the framework needed to rectify the many flaws in it. The language regarding capacity expansion lends itself to this continuing as a car-centric project focused on expansion at the cost of communities along the corridor. Token language towards preserving community health and monitoring air quality don't count for much when the root of those issues continues unaltered. TxDOT's own timeline on their FEIS white paper shows Right of Way acquisition occurring prior to the detailed design

phase, the phase in which TxDOT keeps promising any changes would be considered. The MOU document needs to reflect the Mayor's asks and changes to the core project design need to be made prior to these steps.