



Public comments - NHHIP MOU Working Group Meeting 10/7/20
By Harrison Humphreys, AAH Transportation Policy Advocate

Dear Chair Lewis and MOU Working Group Members:

I would like to thank the committee members and staff again for the time and work put into creating this Memorandum of Understanding. However, our organization, Air Alliance Houston still has serious concerns about the document, particularly in light of the conversation that occurred during the last working group meeting. Chief among these concerns is TxDOT's insistence on maintaining the clause stating that "TxDOT's commitments are contained in the Final Environmental Impact Statement."

One of our organization's main concerns with the project is air quality. As I stated in my comments last week, the FEIS relies on the same insufficient arguments to justify the highway expansion as it did in the DEIS. Ignoring localized air quality impacts, TxDOT claims that regional impacts will be insignificant, despite the fact that the fuel efficiency regulations TxDOT's analyses rely on are being actively rolled back. Additionally, TxDOT's analyses assume any congestion benefits front he project will be maintained indefinitely.

However, the air quality concerns are just a symptom of the core issues of the NHHIP: predominantly low income and minority communities along the corridor would bear the brunt of displacements and environmental impacts of an inadequate project. We believe the current language of the MOU would allow TxDOT to continue with the project without addressing these concerns.

The entire impetus behind the City of Houston's community engagement process was rectifying TxDOT's design and adequately addressing community concerns. Community input was needed to identify the many shortfalls and harmful impacts of the project. Chief among these concerns were designing alternative methods of adding mobility, drastically limiting Right of Way expansion, and mitigating environmental impacts. Mayor Turner's letter in May did an excellent job outlining Vision C, which would address these issue areas, all of which challenge TxDOT's core elements of the project. If TxDOT is not willing to commit to anything beyond the elements contained within the FEIS, without any substantive changes to the areas the community members and the Mayor identified, what is the purpose of this MOU? Why have we spent so much time on this document?

Preserving TxDOT's language regarding the FEIS should be seen as nothing less than an outright refutation of Mayor Turner's requests in his May letter. We ask that that clause be removed and that more specific language defining TxDOT's commitments to collaborate on the requests from the City replace it. In addition, we ask that the MOU include language specifying the mechanism to withdraw funding for the project should the TxDOT fail to address the asks of the community. Failing that, we ask the other parties withdraw from the agreement.

Thank you for your time and consideration.

Harrison Humphreys
Transportation Policy Advocate