

Tuesday, November 30, 2021

The Honorable Peter Buttigieg  
Secretary of Transportation  
U.S. Department of Transportation  
1200 New Jersey Ave, SE  
Washington, DC 20590  
Via email: [pressoffice@dot.gov](mailto:pressoffice@dot.gov)

RE: Request from Congressmen Michael Cloud, Brian Babin, Kevin Brady, Randy Weber, Michael McCaul, Troy Nehls, and Dan Crenshaw to halt investigation into Civil Rights Complaints related to the North Houston Highway Improvement Project (NHHIP)

Dear Secretary Buttigieg,

**We are writing to urge your continued support of a thorough investigation by the Federal Highway Administration into complaints of civil rights violations by the Texas Department of Transportation (TxDOT).**

None of the representatives who authored the November 5, 2021 letter represent districts directly affected by the planned NHHIP. Their claims that opposition is coming from national groups is false: the opposition to this project as currently designed is coordinated among an array of residents, community organizations, advocacy non-profits, governmental and quasi-governmental institutions, businesses, and elected officials, all of whom are local to Houston and Harris County. The TxDOT survey mentioned in the letter from the aforementioned congressmen was unscientific and discriminatory. It is not a reflection of local support for a wider I-45.

The claims that the representatives make in their letter are false. A wider I-45 will not relieve traffic congestion. Houston is already home to the poster child of induced demand: the Katy freeway. Wider highways are not an appropriate or effective intervention to expand commerce opportunities, and they do not expand opportunities for those bearing the greatest burdens of the expansion. Highway construction and expansion interrupt lives, displace people from their homes and businesses, and decimate generational wealth, especially in communities of color.

A wider I-45 will not increase safety or reduce road deaths. Adding a shoulder lane or adjusting curvature for safety will only result in *incremental* reductions of crashes and deaths. A *substantial* reduction in road deaths is TxDOT's only hope to achieve its ["Road to Zero"](#) plan by

2050. Providing other choices of transportation would reduce vehicle miles traveled (VMTs), prevent crashes, and more effectively enhance safety for non-car users of the road.<sup>1,2,3</sup>

A wider I-45 is not a solution for hurricane evacuation egress. Houston and Harris County have witnessed mass evacuation by single-occupancy vehicles and the resulting chaos. More realistic and achievable interventions for mass evacuation include coordinated emergency planning, high-capacity mass transit, and smart delivery of emergency messages. A large portion of the current NHHIP would place I-45 below grade, increasing flood risk.

A wider I-45 will not prepare Houston's infrastructure for projected population growth. If the region sees the amount of growth expected, leaning into our car-centric transportation policy choices will result in more traffic, worse air quality, racial disparities in health outcomes, and more injuries and deaths on Texas roads. The modeling approach used to justify the NHHIP proposal is simplistic and incomplete. For large-scale projects like the NHHIP, the Houston-Galveston Area Council and TxDOT should update modeling data and use scenario planning for growth-projection and project design.

TxDOT's engagement with the public and local government throughout this process was and continues to be inequitable and one-sided. TxDOT presented its plans, asked for feedback, but failed to meaningfully consider and incorporate community feedback regarding displacement, air quality concerns, or loss of greenspace. In response, the City of Houston coordinated its own robust community engagement process that resulted in a significantly different, technically sound alternative called [Vision C](#); it was ignored by TxDOT. Community members and organizations filed Title VI civil rights complaints and Harris County filed a lawsuit to challenge parts of TxDOT's environmental process.

The Title VI investigation gives voice to residents whom TxDOT ignored. The purpose of this investigation is not to draw out the project for the sake of delay; the FHWA must do its due diligence and investigate the very real impacts on the people of Houston. Houston deserves a project that truly prioritizes safety, centers the lived experience of those most impacted, and brings our city into the equitable transportation future it so desperately needs.

Sincerely,

Stop TxDOT I-45

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<sup>1</sup> "The Incompatibility of Vision Zero and VMT Growth," State Smart Transportation Initiative, July 6, 2020, <https://ssti.us/2020/02/24/the-incompatibility-of-vision-zero-and-vmt-growth/>.

<sup>2</sup> "Safety over Speed Week: Our Transportation System Values Some Lives More than Others," Transportation For America, November 6, 2019, <https://t4america.org/2019/11/06/our-transportation-system-values-some-lives-more-than-others/>.

<sup>3</sup> Angie Schmitt, Tanya Snyder, and Aaron Short, "Here's How Much Safer Transit Is Compared to Driving," Streetsblog USA, December 19, 2014, <https://usa.streetsblog.org/2014/12/19/heres-how-much-safer-transit-is-compared-to-driving/>.

Air Alliance Houston  
BIKE Houston  
Circle Coalition  
Coalition for Environment, Equity, and Resilience  
Democratic Socialists of America, Houston Chapter  
Extinction Rebellion, Houston  
Greater Houston Coalition for Justice  
Indivisible Houston  
LINK Houston  
Our Afrikan Family  
Northeast Action Collective  
Sierra Club, Houston Regional Group  
Sunrise Movement Houston  
West Street Recovery