



To whom it may concern,

Air Alliance Houston appreciates the opportunity to comment on the PEL study of the I-45N corridor, CSJ: 0912-00-536. We would like to call to TxDOT's attention a number of concerns we hold in response to the project study documents provided. Our concerns are outlined below:

- Congestion modeling included in the study materials draws on H-GAC's Traffic Demand Modeling data from 2017. For a project currently in a study phase, it is unacceptable to use such outdated data, particularly when one of the primary project "needs" is congestion relief. Using this data calls into question the validity of many other aspects of the PEL study.
- Additionally, population growth rates are not a valid basis for developing a purpose and need for this project. Using population growth projections to justify capacity projects has resulted in the unmitigated sprawl we see in the Houston area today. Furthermore, these population projections have been consistently inaccurate, even more so given the population changes in the past year. According to H-GAC, the region as a whole only grew by roughly net 10,000 people. Montgomery County's recent explosive growth nearly slowed to a standstill in 2022. Population growth projections are too unreliable of a metric to justify the purpose and need of this project.
- Very little information was provided on potential environmental impacts. However, historically, TxDOT capacity expansion projects have resulted in worsening air quality for communities directly adjacent to the project and, by increasing the number of Single Occupant Vehicle (SOV) trips, contributed to the Houston region's overall air quality issues. Additionally, project designs that will facilitate increased VMT on the corridor will likely result in greater greenhouse gas emissions along this corridor. Texas is already responsible for a disproportionate contribution to the global GHG levels; we cannot continue expanding highways at the cost of the environment.

This PEL study comes at a time when many in the Houston region are rethinking transportation priorities. No longer are people willing to trade health, safety, and environmental livability for a modicum of congestion relief - relief that, historically, will disappear after a short period. We urge TxDOT to reconsider congestion relief as a worthwhile or attainable goal. Chasing this goal has resulted in billions spent on highway widenings at the expense of urban centers across the state. We have attached a report our organization released last year that interrogates this issue more comprehensively; we ask that you consider it as alternatives are developed.

We strongly urge that TxDOT develop alternatives that do not add capacity to mainlanes.

Everyone has a right to breathe clean air.

a: 2520 Caroline Street, Suite 100, Houston, TX 77004 | p: 713.528.3779 | w: [airalliancehouston.org](http://airalliancehouston.org)