



February 20, 2024

Advanced Project Development Director
Texas Department of Transportation
Houston District Office
P.O. Box 1386
Houston, TX 77251-1386

Via email: HOU-PIOwebmail@txdot.gov

Re: Proposal for the I-10 Inner Katy Corridor Managed Lanes from Voss Road to I-45, presented by TxDOT, February 8, 2024 (virtual meeting February 6, 2024).

Dear Director:

The White Oak Bayou Association (WOBA) appreciates this opportunity to comment on TxDOT's proposal for the I-10 Inner Katy Corridor, as presented in its February 8, 2024, public meeting. This segment of I-10 includes the portion from Heights Blvd to I-45 which TxDOT has proposed to elevate (please see our most recent comments on that proposal in our letter dated January 31, 2024), and connects to I-45 in downtown Houston, which TxDOT proposes to expand and modify as part of its North Houston Highway Improvement Project (NHHIP) on which WOBA has provided comments on several occasions going back to 2015. We continue to favor the "No Build" alternative.

While we acknowledge that this most recent presentation provides a somewhat more coherent explanation of the context and purported need for this group of "complementary" projects, the improvements are more of form than of substance. WOBA remains unconvinced of the need for these projects, doubtful of the probability that they will provide more than a short-term easing of congestion once completed, and alarmed at the likely cost to the taxpaying public.

In our prior comments we have repeatedly urged TxDOT to conduct, and provide to the public, a rigorous cost-benefit analysis of these projects. Accounting on the cost side of such an analysis should include not just the capital costs of construction (a third of a billion dollars for the I-10 elevation alone), but also the toll of traffic disruptions and air, noise and water pollution. To date, TxDOT has not done so, a glaring omission in responsible use of public funds and poor engineering fundamentals.

What's more, a clear majority of the local community evidently does not want these projects built. As detailed in our January 31, 2024, letter, TxDOT's Response Matrix for the I-10 elevation proposal included only nine individual commenters who were explicitly in favor of the concept out of a total of 466 enumerated commenters (many of which were organizations or elected officials representing thousands of individuals). A clear majority of the other 98% of the commenters either explicitly opposed or stated they did not support the project, while smaller numbers just expressed questions or concerns without explicitly supporting or opposing the project.



Significantly, in its most recent presentation, TxDOT omits any mention whatsoever of the projected costs of any of its proposed managed lane alternatives. TxDOT does, however, allude to the projected benefits in terms of increased capacity and reduced traffic congestion and they are, to say the least, unimpressive. TxDOT's most aggressive alternative (which features two managed lanes and five general-purpose lanes in each direction) would accommodate approximately one fifth more "people" than the no-build alternative. TxDOT states that alternative would "facilitate the movement" of approximately 460,000 "people" per day (making no distinction between cars driven by one person with no passengers or buses carrying 50 people), compared with the current configuration which accommodates approximately 380,000 "people" per day. Those additional 80,000 "people" represent a 21% increase in capacity over the no-build option.

But TxDOT's own analysis predicts that the general-purpose lanes would return to the current levels of congestion by 2045. TxDOT's timeline suggests that construction would start in early 2028 and would take six to eight years to complete. Assuming construction does in fact start in 2028 and requires seven years, the project would be completed in 2035. Then, by TxDOT's own estimate, congestion on the general-purpose lanes would be back to current levels by 2045, a mere 10 years later.

That is frankly astonishing. It is no wonder that TxDOT provided no estimate of construction costs, let alone a rigorous cost-benefit analysis. Scaling up from the \$350-million or so estimated to elevate less than two miles of I-10 from Heights Blvd. to I-45, it seems more than likely that the project costs would be on the order of several billion dollars to provide no more than partial and very temporary relief from congestion, and then what?

And again, the construction costs for this enormous band-aid, whatever that amount turns out to be, are only part of the true cost. If the inevitable traffic disruptions during construction and the environmental impacts during and after construction are factored in, it is difficult to understand how this proposal makes good sense in terms of the benefits that might be realized.

As TxDOT moves forward with the planning process we can only hope and continue to urge that TxDOT will provide the public with a realistic and unbiased appraisal of the true costs, as well as an actual quantitative assessment of the benefits. It is simply not sufficient to quote statistics on how much freight is transported on the highway in terms of tonnage or dollar value. Those numbers in themselves do nothing to enable the public to assess whether this is a good use of our tax dollars.

Going forward, White Oak Bayou Association's principal focus will of course be on the environmental impacts. For example, how will the subgrade drainage systems beneath the lanes, alluded to in TxDOT's presentation, discharge to our local waterways? How will stormwater runoff be managed in such a way that our streams (and ultimately Galveston Bay and the Gulf of Mexico) are not further contaminated by residual petroleum hydrocarbons and heavy metals from road surfaces? These and other considerations must be seriously addressed in TxDOT's environmental assessment. TxDOT must perform its obligation under its 2019 Memorandum of Understanding with



the Federal Highway Administration to look seriously at the potential impacts to the environment and must mitigate the inevitable *cumulative* impacts of the new construction as well as as-yet unmitigated impacts from prior construction. WOBA looks forward to TxDOT's response to these concerns.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Steuer".

Mark Steuer, Ph.D.
President

A handwritten signature in black ink, appearing to read "Robert S. Lee".

Robert S. Lee, P.G.
Past President

cc:

Marc Williams, Executive Director, TxDOT
Eliza Paul, P.E., Houston District Engineer, TxDOT
J. Bruce Bugg, Commissioner and Chair, TxDOT
W. Alvin New, Commissioner, TxDOT
Robert C. Vaughn, Commissioner, TxDOT
Alejandro G. Meade III, Commissioner, TxDOT
Steven D. Alvis, Commissioner, TxDOT
John Whitmire, Mayor, City of Houston
Chris Newport, Mayor's Chief of Staff, City of Houston
Letitia Plummer, Houston City Council, At-Large
Sally Alcorn, Houston City Council, At-Large
Abbie Kamin, Houston City Council, District C
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Ann Lents, Chair, Memorial Heights Redevelopment Authority
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Tina Petersen, Ph.D., Executive Director, HCFCD
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Beth White, President and CEO, Houston Parks Board
Brittani Flowers, President and CEO, Bayou Preservation Association
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