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Association Founder

Lynda Mifsud

30 May 2015
TxDOT District Office
Director of Project Development
P.O. Box 1386
Houston, TX 77251-1386
Email: HOU-piowebmail@txdot.gov

RE: North Houston Highway Improvement Project – I -45
Beltway 8 to US 59 - Public Comments

Dear Director of Project Development,

The White Oak Bayou Association (WOBA) appreciates this opportunity to provide comments on the North Houston Highway Improvement Project. WOBA is a non-profit advocacy organization whose mission is to promote greater public awareness, appreciation, and enjoyment of the White Oak Bayou, its tributaries and environs by advocating the preservation, restoration, and maintenance of the natural wildlife habitats thereof, while promoting compatible educational and recreational opportunities within the area.

WOBA would like to express its concerns with respect to the potential for significant environmental impacts of the proposed reconstruction of I-45 on Houston's bayous and adjacent wetlands along the full reach of the project, and in particular on White Oak Bayou, its tributary Little White Oak Bayou, and its receiving stream, Buffalo Bayou. Our major areas of concern are the potential for the project to exacerbate flooding, further disrupt surface water hydrology and shallow groundwater discharge, cause further deterioration of water quality and wildlife habitat, and create potential barriers to pedestrian and wildlife mobility. On the other hand, we see the potential for improvements in some of these area by proper design and implementation of the project.

Houston's ever-expanding freeways are an immense source of stormwater runoff into the bayous and significant contributor to flooding. Runoff from roads impacts water quality, and therefore aquatic habitat, in the immediately receiving streams and in downstream water bodies, including Galveston Bay. Water quality impacts include the presence of oil and other pollutants, trash and, during summer, excess heat which reduces the water's capacity for dissolved oxygen.

The subgrade sections of the project could potentially result in such impacts even in dry weather if pumping is required to prevent road flooding by shallow groundwater seepage. The project's design should mitigate for these impacts by incorporating vegetated detention basin, engineered wetlands and any other appropriate elements to reduce the flow rate into the bayous and remove pollutants. The project should include mitigation not only for the currently proposed construction, but also for past freeway construction projects that predated mitigation requirements.

The project design, especially in the subgrade sections, should take into account the potential disruption of stream flow, and should not impose barriers to future improvements to the lower reaches of White Oak Bayou, which may include removal of concrete paving and restoration of a meandering channel. When concerns about runoff and flood potential were raised with one of TxDOT's representatives at a recent public meeting, the response was that some of the "kinks" (i.e., meanders) in the channel "might have to be straightened out" in order to move the water downstream faster and prevent flooding. This is absolutely the incorrect approach and it is hoped that this response does not in any way reflect TxDOT's actual intended mitigation strategy.

Finally, the project design should safely accommodate pedestrian and bicycle traffic adjacent to and crossing the freeway, and especially along the waterways. Houston's Bayou Greenways 2020 project has begun a program of major enhancements to and expansion of our parks along the bayous, including improvements to neighborhood access to the parks and connectivity between them. The proposed project should provide for improved access to the parks and should not result in barriers to pedestrians, bicyclists or wildlife. In particular, the project should be designed to accommodate shared-use trails along Little White Oak Bayou from its confluence with White Oak Bayou to the upstream limits of the project, with a connector to Moody Park, as outlined by the Houston Parks Board in its letter to TxDOT dated 3 December 2013.

In summary, while the preliminary design for the portion of the project near downtown has undeniable esthetic appeal, and may enhance automobile traffic through the city, it poses significant potential for adverse impacts to our local waterways and to the accessibility and connectivity of our parks. Therefore, WOBA very strongly urges TxDOT to take these concerns into account in its final plan and design.

Again, we appreciate this opportunity to provide our comments on the project. Should you have any questions regarding our concerns, please feel free to call me at 713-775-7330. Sincerely,



Robert S. Lee
Vice President
White Oak Bayou Association