



August 1, 2022

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: Proposed Freeway Elevation and Reconstruction, I-10 from Heights Blvd. to I-45,
Project No. CSJ 0271-07-326

Dear Director:

The White Oak Bayou Association (WOBA) appreciates this opportunity to provide our comments on the proposed I-10 elevation project as presented in TxDOT's virtual public meeting on July 26. As a non-profit organization founded in 1988, WOBA has worked and advocated for the protection, restoration and preservation of White Oak Bayou and its environs for over three decades.

While understanding that the proposed project is still in the early planning stage, and that the July presentation was necessarily of a general nature, we have significant concerns about potential impacts to the health of the stream and its riparian corridor, based on the information provided thus far. We hope that TxDOT will seriously consider and address these concerns in its evaluation before any decision is made to move forward with this proposed project.

But first, as many of WOBA's members reside in close proximity to the proposed project, and regularly use I-10, we challenge TxDOT's assertion of the need for this project. We question whether elevating this segment of the freeway is either necessary or desirable, especially considering i) the estimated \$347-million construction cost, ii) the unquantified economic and air quality impacts resulting from traffic disruption during construction, and iii) the inevitable increased noise impacts from the elevated lanes on the surrounding community. At a minimum, the project should be subjected to a rigorous cost-benefit analysis before it proceeds any further.

TxDOT states that elevating the roadway above the floodplain is necessary to "reduce *[though not eliminate]* the risk of" temporary flood-related closures. However, TxDOT cites only three historical incidents of flood-related roadway closure along this corridor over a period of more than two decades: Tropical Storm Allison (2001), Hurricane Harvey (2017) and Tropical Storm Imelda (2019). During each of these extreme weather events, a short segment of I-10 was closed for a brief period of time, until floodwaters drained to the bayou with no long-term property damage noted by TxDOT. We know of no other such incidents, including during major storm events such as the Memorial Day, Tax Day and 4th of July floods in 2015, 2016 and 2018, respectively. We request that TxDOT provide detailed information on the frequency and duration of storm-related closures along this portion of I-10, and their estimated economic impacts, if any, to aid the public in assessing whether the cost of the proposed project is truly justified.

TxDOT intends to start construction in the summer of 2024, but is silent on project duration, though it seems certain to be a multi-year period. During this time, the already heavy day-to-day traffic will most likely be significantly disrupted with measurable economic and air quality impacts. TxDOT should provide the public with a realistic estimate of project duration, explain how the predictable traffic disruption will be managed during this time, and estimate its associated economic impacts.



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Significantly, none of the few storm-related road closures cited by TxDOT could have impeded pre-storm evacuation efforts. Nor would any future flooding-related closures impede evacuation, since they occur during or in the aftermath of the storms, not before. By contrast, a major multi-year re-construction project would almost inevitably impede evacuation traffic in the lead-up to future storm events or in other emergencies. TxDOT should inform the public of its plan, if any, for how such potential construction-related public safety hazards will be mitigated.

Houston's topography and climate make occasional short-term road flooding and closures a fact of life, and the proximity of the proposed project to the confluence of White Oak and Buffalo Bayous may increase its likelihood at this location. But compared to the much more frequent flooding of hundreds of homes and businesses, costing billions of dollars and significantly disrupting people's lives, the rare, short-term closure of a short segment of freeway is a relatively minor problem with little or no unpreventable risk to public safety or significant economic consequence. It is more of a nuisance that Houstonians have learned to cope with.

In sum, elevating a 1.8-mile segment of freeway at a cost of more than a third of a billion dollars strikes us as an excessive and wasteful response to a nuisance-level problem. In view of the fact that TxDOT's presentation does not even allude to, much less attempt to quantify, any real costs associated with occasional short-term road surface inundation, the need for, and expense of, such a project is not adequately justified.

Further, TxDOT's proposed solution provides no flood-risk reduction benefit beyond the roadway in question. We believe that such a large amount of money could and should be much more effectively spent on flood-risk reduction efforts that yield more general benefits extending beyond just this short stretch of I-10. We encourage TxDOT to collaborate with Harris County Flood Control District to identify a more practical and economical solution, if one is in fact really needed.

Turning now to our more directly bayou-related environmental concerns, we want to emphasize at the outset our strong opposition to any project that will result in further environmental degradation of White Oak Bayou or its adjacent greenway. Both have been impaired by past freeway construction among other causes, and the community has been working to mitigate the damage in the long-term. We understand that TxDOT's current assessment of potential environmental impacts is at an early stage, but some significant concerns are already evident based on the limited information included in the July 26 presentation.

Perhaps most significant among our concerns relates to the plan for stormwater detention. Approximately three-quarters of the 21.7-acre "Potential Detention Area" outlined on TxDOT's "Schematic" exhibit lies beneath the raised freeway. This strikes us as an obvious case of engineered blight waiting to happen. Judging by the typical urban freeway overpass, it would at best be an eyesore and ongoing maintenance issue, or worse, a public health hazard.

Such a feature would inevitably become a site for the accumulation of trash (much of which would likely find its way to the bayou) and quite possibly for illegal dumping and possibly rat infestation. In addition, by effectively putting a roof above the pond, sunlight will be blocked, impeding both evaporation and plant growth. Whether such a pond is constructed with a paved or earthen floor, impounded stormwater is likely to stagnate creating a mosquito breeding ground. How impounded water is ultimately conveyed to the bayou is not clear from TxDOT's presentation, but there does not appear to be a plan to create any sort of engineered wetland area or other feature that would help to minimize further degradation of water quality in the bayou.

Further, the uncovered portion of the "potential detention area" across the channel from White Oak Park, shown on the Schematic by purple-shading, destroys most of the largest riparian



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woodland adjacent to White Oak Bayou within the 610 Loop. The character of this area should be preserved, not degraded or destroyed. Beyond elimination of habitat, removing trees from an urban heat island is antithetical to maintaining Houston's sustainability as well as damaging to an already compromised riparian corridor. At a minimum, before proceeding, TxDOT needs to clarify its plan for stormwater detention for this project and detail how it would prevent further degradation of an already stressed environment.

Another issue of concern for us is the increased noise level associated with the elevated lanes themselves. Elevating the lanes will worsen the propagation of traffic noise not just along the bayou and in the adjacent parks, but also into nearby neighborhoods. This will not only disturb human inhabitants but may also adversely impact birds and other wildlife residing along the riparian corridor.

Finally, we also want to remind TxDOT that the 1.8-mile long proposed project area includes the downstream-most 1-mile reach of the concrete lined portion of the White Oak Bayou channel. This reach is the study area for the 2017 *Lower White Oak Bayou Channel Restoration Study*, prepared for the Harris County Flood Control District (HCFCD) by its contractor Freese and Nichols, Inc. (and funded by the Memorial Heights Redevelopment Authority / TIRZ 5.) This feasibility study demonstrated the potential for eventually removing the aging and decaying concrete channel liner and restoring the channel to a more natural state. The study found that this could be done without increasing flood risk and would ultimately reduce long-term maintenance costs associated with repeatedly repairing or replacing the concrete liner.

WOBA provided a copy of the report to TxDOT District Engineer Quincy Allen along with our comments on TxDOT's proposed I-45 expansion in a letter dated February 15, 2018, and we continue, along with other groups and individuals, to advocate for the eventual restoration of the White Oak Bayou channel. WOBA has suggested to TxDOT that helping to fund this project could be one way of mitigating for some of its past or present impacts.

Although the feasibility study currently requires revision pending post-Hurricane Harvey updates to assumptions regarding model storm events and floodplain mapping, restoration of the channel remains an important long-term priority for many in our community. The feasibility study provides the basis for a pilot-project which would be a significant step in the direction of sustainable, nature-based solutions to Houston's flooding problems. We wish to emphasize that any future highway projects should facilitate this possibility and not be constructed in a manner to impede or preclude it.

In conclusion, TxDOT should i) look beyond the narrow confines of its highway rights-of-way, ii) pay more attention to the potential for collateral damage associated with its proposed projects, some of which may be neither necessary nor desirable, and iii) engage with the community in seeking more holistic and sustainable solutions to flooding problems, rather than reflexively and needlessly tearing up and reconstructing existing freeways. Where there is a need for some such project, TxDOT should evaluate, in coordination with HCFCD and other stakeholders, whether more effective and cost-efficient alternatives might be pursued.

Alternative approaches, including channel restoration combined with increased in-line detention and additional upstream detention, would have flood-risk reduction benefits extending well beyond just the I-10 right-of-way. We believe the \$347-million estimated for elevating the freeway could be much better spent on sustainable flood risk reduction measures that also result in environmental uplift and community improvement rather than adversely impacting both our community and our environment.



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We strongly urge TxDOT to bear this in mind as it moves forward in its evaluation of potential environmental impacts and projected costs associated with the proposed construction, and to seriously consider whether the potential benefits of this project truly justify its costs in terms of both dollars and quality of life criteria. We would be more than happy to discuss these matters with you in the coming months and we will continue to review TxDOT's relevant reports and provide you with our insights and perspective.

Thank your for your consideration.

Sincerely,

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

Mark Steuer, Ph.D.
President
White Oak Bayou Association
Email: contact@whiteoakbayou.org

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

Robert S. Lee, P.G.
Past President
White Oak Bayou Association

Cc:

Governor Greg Abbott, Texas Governor
Lt. Governor Dan Patrick, Texas Lt. Governor
Senator John Cornyn, United States Senate
Senator Ted Cruz, United States Senate
Marc Williams, Executive Director, TxDOT
James Koch, Dir. Transportation Planning & Development, TxDOT Houston District
Rep. Christina Morales, House of Representatives, District 145
Rep. Penny Morales Shaw, Texas House of Representatives, District 148
Sen. John Whitmire, Texas State Senate, District 15