



December 19, 2023

To:
Harris County Commissioner's Court

The Hardy Downtown Connector represents a once-in-a-lifetime opportunity for Houston and Harris County to construct a visionary project that connects communities instead of further dividing them. The current Hardy Downtown Connector plans represent a continuation of harm against the Near Northside community that is already suffering environmental injustice. Beneath proposed park and trail improvements, the current plans for the Hardy Connector are based on a central premise: a four-lane, partly elevated, partly trenched and capped highway. Despite the amenities HCTRA has proposed to accompany this design, a new four-lane highway, by definition, will produce more traffic- and construction-related air and noise pollution than cannot be reasonably mitigated while further dividing this neighborhood.

A result of outdated data justifying the project, as well as insufficient public engagement, we request that Harris County Commissioner's Court take the following actions:

- 1. Delay the next Request for Proposals regarding the Hardy Downtown Connector until it includes the following:**
- 2. Re-study the corridor with the additional context of no new car lanes, as well as the added context of increased residential population in and near downtown. Engage METRO in the study of regional transit in the Hardy corridor, including transit utilization of the existing Hardy Toll Road; and**
- 3. Re-task HCTRA with conducting community engagement on the need for the Hardy Connector vs. other alternatives for moving people and goods through the Near Northside. This is what the next RFP should be.**

The current plans are rooted in a twenty-year-old study called the North Hardy Planning Alternatives Analysis Report. Gifted with hindsight, this study relies on what we now know is proven incorrect data. At the center of the incorrect data in the North Hardy Corridor report is the projection of increased driving demand in the Hardy Corridor. To address projected increased driving demand, the North Hardy Corridor report evaluated future expansion scenarios for the IH-45 corridor under the assumption that the Hardy Toll Road would have a four lane (2N/2S) extension from I-610 to Downtown, and that the Hardy Toll Road would be expanded to six lanes (3N/3S) from Beltway 8 to IH-45 N in Montgomery County (page ES-10, Highway Component).

The report evaluates transportation project effectiveness by comparing a roadway's volume (the actual car throughput) to the roadway's capacity (the maximum car throughput at design speed) in a metric known as the V/C ratio. Comparing the North Hardy Study's IH-45 traffic volumes for the year 2000 and the IH-45 traffic volumes from 2015 in the Final Environmental Impact Statement for the North Houston Highway Improvement Project (IH-45 Expansion), it is evident through stagnant and reduced V/C ratios that driving demand in the North Hardy corridor did not increase over a 15-year period:

Exhibit ES.3: IH-45 Traffic Volumes

| Section | 2000 Daily Traffic Volume | Volume to Capacity Ratio (V/C) | Level of Service (LOS) | Peak Period Speed |
|----------------------|----------------------------------|---------------------------------------|-------------------------------|--------------------------|
| IH-10 to IH-610 | 224,000 | 1.11 | E | 36 mph |
| IH-610 to Beltway 8 | 262,000 | 1.30 | E | 31 mph |
| Beltway 8 to FM 1960 | 234,000 | 0.93 | D | 40 mph |
| FM 1960 to SH 242 | 158,000 | 0.88 | D | 42 mph |
| Reversible HOV Lane | 7,322 | 0.43 | B | 55+ mph |

Source: Texas Department of Transportation, Houston-Galveston Area Council as compiled by Carter & Burgess, Inc. Date: 2/2002

(Reference: North Hardy Planning Alternatives Analysis Report, Exhibit ES-3)

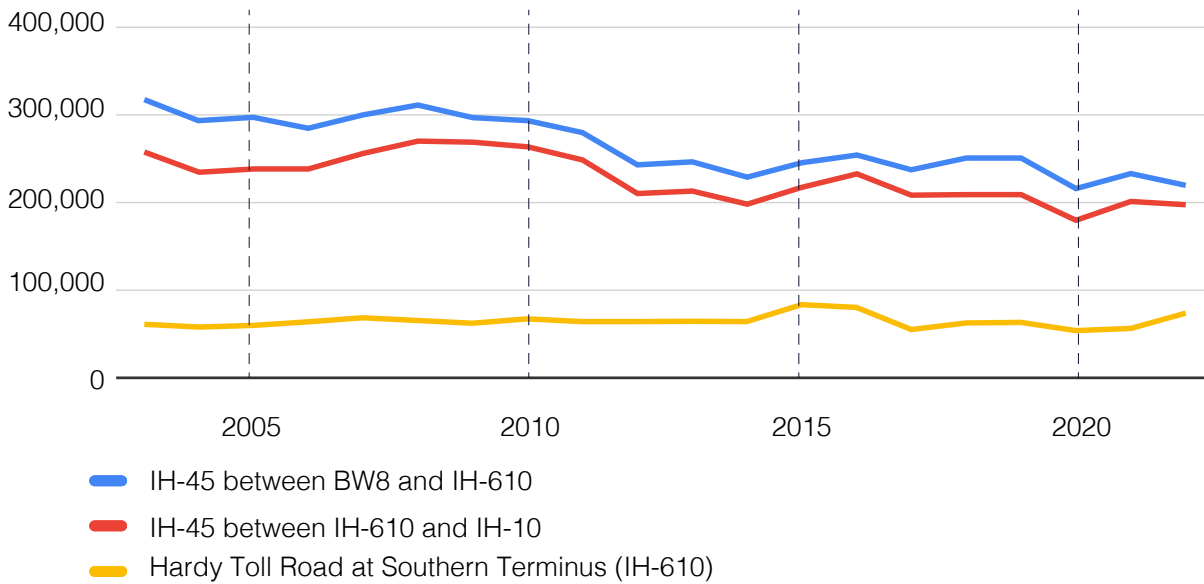
Table 1-3: Existing (2015) and Future (2040) Volume-to-Capacity Ratios, Congestion Level, and LOS

| Roadway | Segment | 2015 | | | 2040 | | |
|-----------------|-----------------------------------|-----------|------------------|-----|-----------|------------------|-----|
| | | V/C Ratio | Congestion Level | LOS | V/C Ratio | Congestion Level | LOS |
| I-45 | Beltway 8 North to Shepherd Drive | 1.13 | Serious | F | 1.23 | Severe | F |
| | Shepherd Drive to I-610 | 1.08 | Serious | F | 1.13 | Serious | F |
| | I-610 to I-10 | 0.99 | Moderate | E | 1.07 | Serious | F |
| | I-10 to Allen Parkway | 1.09 | Serious | F | 1.13 | Serious | F |
| | Allen Parkway to US 59/I-69 | 1.22 | Serious | F | 2.09 | Severe | F |
| Hardy Toll Road | Beltway 8 North to I-610 | 0.55 | Tolerable | C | 1.22 | Serious | F |
| US 59/I-69 | I-10 to I-45 | 0.79 | Moderate | D | 0.97 | Moderate | E |
| | I-45 to Spur 527 | 1.15 | Serious | F | 1.27 | Severe | F |
| I-10 | I-45 to US 59/I-69 | 0.77 | Moderate | D | 1.02 | Serious | F |
| I-610 | I-45 to Hardy Toll Road | 0.81 | Moderate | D | 1.05 | Serious | F |
| Beltway 8 North | I-45 to Hardy Toll Road | 0.82 | Moderate | D | 1.21 | Serious | F |
| SH 288 | South of US 59/I-69 | 0.60 | Tolerable | C | 0.70 | Moderate | D |

Source: H-GAC 2015

Furthermore, TxDOT’s own Average Annual Daily Traffic (AADT) data shows a measurable decrease in driving demand in the 2000s and 2010s. Decreases in driving demand were also supported in recent years by the onset of the COVID-19 pandemic, a decrease that remains today, nearly four years after the arrival of the pandemic in the United States. Basing the current plans off old, and now proven incorrect, projections also does not take into account the myriad of things that have happened in this area since 2003 including: the Elysian viaduct rebuild, Red Line North extension, development of Hardy Yards apartments, implementation of the Houston Bike Plan, new Infrastructure Design Manual standards, the non-attainment of our ozone compliance, as well as the recent Houston and Harris County Climate Plans.

Average Annual Daily Traffic (AADT) of North Houston Highways



| AADT_YEAR | IH-45 between BW8 and IH-610 | IH-45 between IH-610 and IH-10 | Hardy Toll Road at Southern Terminus (IH-610) |
|-----------|------------------------------|--------------------------------|---|
| AADT_2022 | 219,139 | 197,040 | 73,000 |
| AADT_2021 | 232,407 | 200,880 | 55,397 |
| AADT_2020 | 215,192 | 179,357 | 52,759 |
| AADT_2019 | 250,224 | 208,555 | 62,069 |
| AADT_2018 | 250,224 | 208,555 | 61,454 |
| AADT_2017 | 236,910 | 208,035 | 54,062 |
| AADT_2016 | 253,697 | 232,139 | 79,227 |
| AADT_2015 | 244,962 | 216,929 | 82,327 |
| AADT_2014 | 228,446 | 197,501 | 63,062 |
| AADT_2013 | 245,905 | 212,595 | 63,315 |
| AADT_2012 | 242,510 | 209,660 | 63,000 |
| AADT_2011 | 279,210 | 248,070 | 63,000 |
| AADT_2010 | 293,000 | 263,060 | 66,000 |
| AADT_2009 | 296,450 | 268,380 | 61,000 |
| AADT_2008 | 310,660 | 269,630 | 64,000 |
| AADT_2007 | 299,440 | 255,650 | 67,000 |
| AADT_2006 | 284,200 | 237,900 | 62,190 |
| AADT_2005 | 296,840 | 237,900 | 58,130 |
| AADT_2004 | 293,000 | 234,000 | 57,000 |
| AADT_2003 | 317,000 | 257,000 | 60,000 |

Moving beyond the flawed assumptions underlying the current plan, HCTRA has failed to provide sufficient public engagement opportunities on the project. Prior to 2023, HCTRA had not hosted a public meeting on this project since June 17, 2019. During both recent public meetings on March 1, 2023 and October 25, 2023, HCTRA and their consultants offered no opportunities to provide input on the design of the tolled roadway facility itself. Input was sought on the amenities proposed alongside and on top of the four-line highway, which is not the same as receiving input on project design or its underlying assumptions and need. In fact, 25% of the public comments from the first public meeting on March 1 expressed a desire to comment on the design of the roadway itself, but were left unaddressed. HCTRA should re-start its engagement process by asking communities about how they want to move and what infrastructure would serve those requests, to then design a facility that meets the transportation and quality of life needs of all users. As it stands, HCTRA is operating from an assumption that a four-lane highway is needed and wanted without putting this question to the community through which the highway will be located.



This project is a once-in-a-generation opportunity to do something transformational in Harris County. The possibilities of what could be done alongside the community are endless: redesigning Hardy and Elysian streets as neighborhood boulevards, holistically reconnecting divided parts of Near Northside by converting the Center Point right-of-way into a greenway as has been proposed previously, suppressing the Union Pacific train lines, and replacing affordable housing that was taken twenty years ago for HCTRA right-of-way. There are also opportunities to truly mitigate the worst costs of the IH-45 expansion by investing in more public transit, pedestrian and bike infrastructure, community gathering places, and parks and greenspace. With the upcoming 2026 World Cup, a project centrally focused on Bus Rapid Transit or connective Greenways could be transformative for both the Near Northside neighborhood in addition to visitors.

This is a generational opportunity to build a project that can mitigate past harms, instead of creating more harms to be mitigated. We are asking you to take a brave step towards transformative change for Houston, for all of us.

Sincerely,

Jennifer Hadayia, MPA
Executive Director
Air Alliance Houston