August 11, 2024

Eliza Paul
Houston District Engineer
Texas Department of Transportation (TXDOT)
7600 Washington Ave
Houston, TX 77007

Re: Support for the No Higher No Wider I-10 Freeway Cap Proposal / Opposition to Widening or Elevating I-10

Dear Ms. Paul:

I am writing today to express our support for the No Higher No Wider I-10 proposal, echoing the support of multiple local civic clubs and elected officials representing the impacted areas. Conversely, we oppose any proposals to add single occupancy vehicle lanes to the I-10 corridor.

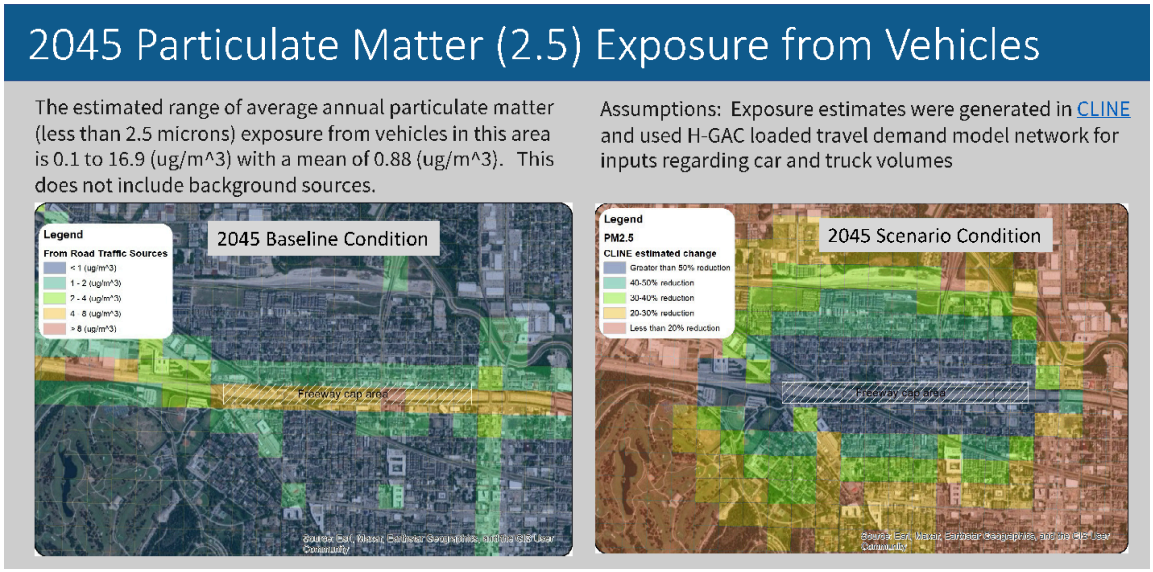
Air Alliance Houston (AAH) is the area's longest running advocacy organization focused solely on clean air. We are deeply involved in transportation policy because on-road emissions are consistently a top source of carbon and other greenhouse gas (GHG) emissions in Harris County and in the 13-county Houston region as a whole.[1] Our MPO has prioritized mode shift from SOV to public transit, walking, and biking as a necessary strategy for reducing GHG emissions in the region.[2] Induced demand created by lane additions to freeways, as has been seen for decades following the expansion of the Katy Freeway, does nothing to achieve this regional goal.

To examine this specific TXDOT proposal for I-10, we applied a nationally-reliable air quality modelling system that uses local data from TXDOT and the MPO called the Houston Public Health Assessment Model, or HPHAM.[3] We used the No Higher No Wider I-10 freeway "cap" proposal as the desired future state (2045 Scenario) and compared it to the current design of I-10, as is, with no additional lanes, if it were to be untouched in 2045 (2045 Baseline). The results show a clear overall health benefit from the "cap" proposal to nearby communities including reductions in car use and increases in walking/biking:

[1]Houston-Galveston Area Council (HGAC), Climate Pollution Reduction Program, Priority Climate Action Plan, March 2024. Online: https://www.h-gac.com/getmedia/c02858ab-a184-4cbe-9eae-dacb442e3f02/H-GAC-PCAP-Action-Plan-March-2024
[2] *Ibid*
[3]Urban Design for Health, Houston Public Health Assessment Model: Quantifying Health Equity, Economic & Air Quality Impacts of Transportation Investments. Online: https://urbandesign4health.com/projects/houston-public-health-assessment-model

Outcome	2045 Baseline	2045 Scenario	Scenario Change (%)
Adult Population	13,966	13,966	0.0 %
Avg. Annual Health Cost per Adult	$1244	$1104	-11.3 %
BMI	26.8	26.1	-2.6 %
BMI>30 (%)	25.0 %	16.8 %	-32.8 %
BMI>25 (%)	72.4 %	68.4 %	-5.5 %
Type 2 Diabetes (%)	5.4 %	3.7 %	-31.5 %
Hypertension (%)	23.1 %	22.5 %	-2.6 %
Coronary Heart Disease (%)	3.4 %	3.3 %	-2.9 %
Depression (%)	17.0 %	16.6 %	-2.4 %
Walk for Transport (%)	35.5 %	45.8 %	29.0 %
Bike for Transport (%)	5.0 %	7.0 %	40.0 %
Transit Use (%)	5.7 %	5.5 %	-3.5 %
Personal Vehicle Use (%)	99.8 %	99.4 %	-0.4 %

The model also predicts a significant reduction in near-road air pollution from the "cap" proposal compared to keeping I-10 as is, including Particulate Matter (PM), carbon monoxide, carcinogens, and the components of smog (ozone). Here is the modelling for just one of these air pollutants; the modelling for all others shows a similar pattern:



If a freeway cap on this portion of I-10 produces these air quality and public health benefits vs. its current state, imagine how much more beneficial a cap would be vs. an I-10 with *additional* lanes, projected to increase congestion by 138,000 vehicles per year, as your office is proposing.

The Houston MSA is now in severe non-attainment for not reaching national ozone standards and will soon be in non-attainment for PM pollution as well.[4] If measures are not taken now to drastically reduce our ozone and PM pollution, our region will remain under costly SIPs and costly air pollution, which harms people's health and quality of life.

[4]Texas Commission of Environmental Quality, Public Information Meeting: Particulate Matter (PM) Standard Revision. Online: https://www.tceq.texas.gov/downloads/air-quality/sip/pm/designations/naaqs-pm25-2012/pm-naaqs-revision-outreach_houston_2024.pdf

I regard to cost, I would be remiss if I did not also note that the current projected cost of the I-10 widening/elevating project is $63M above budget.[5] Houston does not need, and cannot afford this project (either from an economic, air quality, or health standpoint).

In conclusion, we are in strong support of the No Higher No Wider I-10 proposal and oppose any proposals to add vehicle lanes to the I-10 corridor. If you have any questions about this letter or would like to have us present the modelling data to you or your team, please feel free to contact me at any time at (713) 539-1894.

Sincerely,



Jennifer M. Hadayia, MPA
Executive Director

[5]Houston Chronicle, Bid for I-10 elevation project comes in $63M more than expected, swelling price to more than $400M. Online: https://www.houstonchronicle.com/news/houston-texas/transportation/article/txdot-i10-elevation-white-oak-bayou-19621686.php?sid=61b8b59389907a05ea4f2cc2&ss=P&st_rid=5d79b0c3-7ebf-4c32-93c7-757c3be68675&utm_source=newsletter&utm_medium=email&utm_term=&utm_campaign=HC_AfternoonReport