

EMAILED TO: HOU-piowebmail@txdot.gov

Comments on Community Impacts Assessment

About our Organization

Founded in 1988, Texas Housers is a statewide policy advocacy organization that believes in the right of all Texans to experience the powerful sense of belonging that comes from a safe, healthy, and affordable home in the neighborhood of their choice. Our advocacy also extends to equitable disaster recovery and issues of neighborhood quality. The proposed expansion of I-45 impacts all areas of our work in Houston.

Executive Summary

- In these comments we've sought to do three things. First, we want to register our clear disapproval of this project which would only continue this city's dismal track record of putting pavement over people. There is no formula that can quantify the value of what ill-conceived projects like this have cost American cities. Second, we've added context we feel this draft report is lacking by providing references to additional sources on Houston's housing crisis and history of transit activism. We encourage the project team to read, reflect, and respond to the bibliography and image appendix provided to demonstrate their sincere interest in crafting a project that works for Houstonians. Third, we've requested clarity and offered recommendations on key points related to housing and quality of life should the project move forward under the preferred alternative.
- Our comments fall under two broad categories: please clarify and recommendations. In "please clarify" comments TxDOT is being asked to provide insight into its decision-making process and provide relevant data sets. Items in the "please clarify" heading will be followed up with a TPIA request. Texas Housers has offered "recommendations" based on TxDOT's listed Preferred Alternative. Once again, it is our understanding that the best way to improve the project would be to scrap it altogether and develop modern transit solutions in close coordination with residents, METRO, the Harris County Toll Road Authority, and the City of Houston.

Methodology of Assessment

3.1 Community Profile

RECOMMENDATION

Community profile should take into account changes over time and trends. It's necessary, but insufficient to examine the current demographics as well as forecasted changes in communities impacted by the highway expansion.

RECOMMENDATION

The community profile should take into account the rich history of these neighborhoods. By not taking history into account, this project risks making inexcusable mistakes. The history of displacement and disruption is long and deep in historically Black neighborhoods, like Fifth Ward, Independence Heights, and Third Ward. The impacts of this expansion will compound upon the significant losses caused by prior highway construction. For example, the community profile should account for cultural, economic, and historic districts, like the historic ones on Jensen Drive and Nance Street, and the currently thriving cultural district on Lyons Ave in Fifth Ward.

RECOMMENDATION

The community profile as it currently stands also fails to account for the intimacy of knowledge that residents have of their communities. Without performing rigorous qualitative data collection through community meetings held early and often or one-on-one conversations (of which there were only seven that influenced the report) there is no possible way TXDoT could come close to understanding what stands to be lost or what it means to people. One example of this, is the loss of motels which serve as primary residences for many community members in Independence Heights who earn low-income.

3.2 Land Use

PLEASE CLARIFY

What "natural" beneficial traits of the land ex: is there a swamp that acts as retention/detention.

PLEASE CLARIFY

What are the "unnatural" beneficial traits of land use?

PLEASE CLARIFY

What ‘bad land use actors’ (i.e. scrap metal recyclers, concrete batch plants, chemical facilities, electroplating facilities, petrochemical facilities) will be displaced? Will they return? If so, with what stipulations?

PLEASE CLARIFY

What ‘good land use actors’ (i.e. parks, libraries, grocery stores, multiservice centers) will be displaced? Will they return? If so, with what incentives or stipulations?

PLEASE CLARIFY

How is land use being coordinated with METRO’s plans for the future - rapid bus and light rail - in the project area? Are there plans to incentivize mass transit use along the project area during and after the project through the use of dedicated lanes for rapid bus transit or light rail along feeder roads etc.

3.4.1 Residential displacements

PLEASE CLARIFY

Has a survey been conducted of all potentially displaced people determining their desire to exercise their right to return, where they’ll go in the meantime, the impacts on their employment and transit. If not, why?

- If a survey has been conducted, how have its results been reconciled with affordability concerns in the project area?
- If a survey has been conducted, how have its results been reconciled with residential land-use projects planned in the project area?

PLEASE CLARIFY

How have the projected impacts of the displacements occurring in Project Segment XXX been reconciled with the projected impact of the almost certain displacements from the nearby Rice ION development?

PLEASE CLARIFY

How have the projected impacts of the displacements occurring in Project Segment XXX been reconciled with the projected impact of the displacements/decreasing affordability from East River development?

PLEASE CLARIFY

Can you confirm that if a home is within 25 feet, but there parcel won’t be impacted, that home won't be displaced?

PLEASE CLARIFY

What is the loss of dedicated section 08 properties or properties housing tenants with housing choice vouchers? Will there be extra support for those with public benefits who are displaced? Studies indicate that because of the state of Texas' source of income discrimination voucher holders have a harder time using their benefit. ¹

PLEASE CLARIFY

There's an exception on displacement for "a recently constructed townhome community" and a historic building.

- Which standards were used to justify the exemption provided to the recently constructed townhome community?
- Which historic building? Is Greater Mt. Olive also an exception?

3.4.3 Availability of Residential and Business Spaces

RECOMMENDATION

Potential replacement housing was identified using comparable appraised values of homes being displaced, but the identification of replacement housing ought to include the following factors in addition to appraised value:

- Access to public transit
- Proximity to schools and other public resources
- The 3-5 mile geographic area for replacement housing could take people all the way across Houston and impact peoples' jobs, school enrollment, and family connectivity. That area is too big to be "comparable;" the displaced person should determine how far they are willing to move and TxDOT should accommodate those needs.
- Same number of bedrooms²
- Access to comprehensive healthcare services including family medicine and emergency medical services.

RECOMMENDATION

In the case that there is no comparable Decent, Safe and Sanitary housing available within the region that displaced people are looking for housing, TxDOT should build affordable housing there.

¹ Voucher holder/SOI discrimination and the need for for supportive programming including relocation counseling.

² Bedroom size can greatly impact the resale value of a home and have long standing impacts on generational wealth.

RECOMMENDATION

The final list of factors used to identify potential replacement housing should include the above listed metrics and any additional factors uncovered during by City of Houston's Planning Department during its community engagement meetings.

RECOMMENDATION

Using HCAD records to identify rental replacements for displaced tenants does not take into account the quality of these apartments. Given that renters bear the brunt of the residential displacements, TxDOT should go further to identify Decent, Safe, and Sanitary housing. If it is not able to find replacement rentals within the displaced person's neighborhood, TxDOT should build such housing or fund modifications to apartment complexes that will bring the conditions up to a Decent, Safe, and Sanitary level.

RECOMMENDATION

TxDOT should share publicly the comparable replacement single-family housing outcomes from the HAR 2019 website.

Community Profile

Table 4-2

- Segment 1 is 87% non-white or Hispanic and that's the segment that has had the least community engagement, the lack of rigorous engagement with this community is unacceptable. Why was outreach lacking in this project segment? Explain why it's had the least community engagement.

4.1.1.2

- Again, approximately 51.7 % of the total pop in census tracts in Seg 1 are LEP (98.9% Spanish) -- that means they should have these reports in Spanish, etc. Why is this report and other critical documents unavailable in Spanish? What is the process that a Spanish-speaking resident of segment 1 would have to go through to receive a copy of the report in Spanish?

Impacts of the Preferred Alternative

A consistent refrain from residents at community meetings convened by the City of Houston Planning Department was concern about flooding. Section 5 which purports to discuss the impacts of the preferred alternative, but does not enumerate potential flood impacts. This is a serious oversight and represents a failure to anticipate the most serious quality of life concerns that residents have about this project.

You can remedy this in your final draft Community Impact Statement by including a section on flooding as well as explaining how current traffic patterns would be impacted and denoted which comments were incorporated from the community meetings convened by the city.

5.1 Displacements

RECOMMENDATION

Using only one metric to measure housing stress is not sufficient. In addition to the sole metric TxDOT was planning on assessing (change in median home value), multiple metrics should equally weighted and combined to form a score. Those include the demolition of affordable housing, the expiration of tax credits for low-income housing tax credit properties, the number of new affordable homes created, the number of housing cost burdened (rent or mortgage) households.

RECOMMENDATION

Any compensation should account for the likely increase in property taxes in gentrifying areas.

RECOMMENDATION

Construct replacement housing to address impacts over time (loss of housing on original constructions)

RECOMMENDATION

It is clear that there is a disproportionate impact on the historically Black neighborhood in Fifth Ward -- you should use the affordable housing \$\$ here and build housing to make up for previous harms -- over 1000 properties displaced in Fifth Ward as a result of I-10 and US 59/I-69

PLEASE CLARIFY

What, if any, resources are being dedicated to help undocumented residents who are being displaced find new housing?

PLEASE CLARIFY

Does TxDOT guarantee that neither it, nor its employees, will divulge the residency status of undocumented Houstonians displaced by the project to other governmental entities? What safeguards are in place to ensure these leaks don't happen? If those leaks do happen, how will TxDOT address them?

5.1

PLEASE CLARIFY

The document states that, “No person would be displaced by the proposed project unless and until adequate replacement housing has already been provided or is in place,” please clarify what this looks like?

RECOMMENDATION

TxDOT should go beyond following the URA and Real Property Acquisition Policies Act of 1970. The following should be universally available to all displaced people:

1. The option for down payment assistance
2. Help with finding new jobs
3. Help enrolling children in new schools if applicable
4. Transport to look at houses/apartments
5. Rental application assistance
6. Security deposit and pet deposit assistance
7. One-on-one counselling with information about
8. The opportunity to move to a place in the neighborhood of their choice or stay in their neighborhood and not be rent burdened
9. Rental assistance
10. A fair price for their home that allows them to relocate in the rapidly gentrifying project areas or an area of their choice and afford any increase in property taxes.
11. Assistance clearing deeds
12. Moving costs
13. Replacement of displaced public housing units including those destroyed by Hurricane Harvey
14. Construction of new, affordable housing with long-term (40+ year) affordability.

5.1.2.2

RECOMMENDATION

TxDOT claims that “homeowners will receive a fair market value for their property”. Fair market value is wholly insufficient compensation given the metro area’s high (and rising) housing and transit cost which combine to make Houston more expensive than New York. We recommend compensation beyond fair market value and offer the standard set by the relocation of the Hillcrest in Corpus Christi as a starting point.

RECOMMENDATION

We know that Houston is notorious for substandard housing. For example, “twenty-eight percent of Houston’s apartment complexes do not [even] have an active Certificate of

Occupancy.”³ Therefore, in the case that TxDOT is unable to find DSS comparable housing, TxDOT should fund its construction.

PLEASE CLARIFY

When will TxDOT conduct the group/program informational workshops listed on page 5-6, including first time homebuyer seminars, escrow process and title clearing, how to check your credit and improve your score, etc? How is TxDOT spreading the word about these programs? What entity is conducting them?

RECOMMENDATION

Some of these trainings take time to execute. TxDOT should already be running these trainings for all three segments of the project.

PLEASE CLARIFY

Houston is an increasingly unaffordable metropolitan area for low-to-moderate income renters.⁴ The project corridor is home to scores of “naturally occurring affordable housing”. Given this fact, what does the following sentence from the Community Impact Assessment mean for renters: “TxDOT will determine the maximum payment available in accordance with established procedures”. Please share the formula by which maximum payments will be determined.

RECOMMENDATION

TxDOT should publish what it’s offering for each property publicly so that people can better advocate for themselves and be assured of equitable treatment.

RECOMMENDATION

The contracts and operating procedures of the entities providing individual advisory services for displaced people should be made available to the public in multiple languages spoken in the project corridor.

RECOMMENDATION

In addition to a fair market value for their property and reimbursement for moving costs, TxDOT should universally pay for transit costs incurred in looking for new housing, storage costs, and transitional/temporary housing costs if they are necessary. TxDOT should specify the kinds of loan-related fees and costs that it will supplement (5-5).

³ Out of Order: Houston’s Dangerous Apartment Epidemic Way, Heather K and Fraser, Carol, The University of Texas School of Law Entrepreneurship and Community Clinic, 2017

⁴ Aurand, Andrew, The Gap, Shortage of Affordable Rental Housing, *National Low Income Housing Coalition*, March 2019 <https://reports.nlihc.org/gap>,

RECOMMENDATION

TxDOT should provide more than 90 days notice as it can take much longer than three months to identify suitable replacement housing. Again, TxDOT should pay for transitional or temporary housing.

RECOMMENDATION

TxDOT should build/supply transitional housing and then guarantee its permanent affordability. Will be immediately available to displaced people.

5.1.2.5

RECOMMENDATION

The report should assess the impacts of the 3 displaced bus stops on residents in and around Kelly Village, including their roles in commute times, access to jobs, access to schools, and family connectivity.

RECOMMENDATION

The highways' historic impacts on Kelly Village should be accounted for. Kelly Village abutted neighborhood streets before I-10 and US 59/I-69 were constructed. The construction of these highways significantly impacted how people moved around and into and out of the Greater Fifth Ward.

RECOMMENDATION

TxDOT hasn't engaged with public housing residents since 2017. TxDOT should be corresponding with residents on a regular basis to ensure that mitigation meets their needs.

RECOMMENDATION

Displaced public housing tenants should have the option to stay in the same neighborhood, keep their children in the same schools, and have similar access to public transit.

RECOMMENDATION

Displaced tenants should only have to move once. Therefore, replacement housing should be available at the time that tenants are displaced.

5.2 Community Cohesion

RECOMMENDATION

TxDOT plans to connect the Heights to Near Northside and EaDo to Downtown, continuing to leave Fifth Ward with few connections to downtown. TxDOT should prioritize easy and pedestrian-friendly access to downtown for residents in EJ communities near downtown, like Fifth Ward and Third Ward.

RECOMMENDATION

TxDOT should provide needed remediation to the site of the old Bruce Elementary school, where Goodwill Missionary Baptist Church will be relocating.

RECOMMENDATION

I-10 changes will widen separation between north and south 5th Ward. This comes after a legacy of displacement and disruption. TxDOT should make up for this history by providing extra connections to downtown. TxDOT ought to read and give extra credence to super neighborhood, civic club and resident comments from the area.

5.6.4 Summary of Noise Impacts and Proposed Mitigation

RECOMMENDATION

Historically environmental justice communities experience higher levels of noise pollution. The expansion of I-45 will only add to this burden. Equity in mitigating noise impacts should account for and offset historic harm.

5.7 Air Quality and Community Resources (ask AAH)

RECOMMENDATION

TxDOT should analyse the air quality locally, specifically in neighborhoods surrounding the NHHIP; the department should not rely on data that is regional.

RECOMMENDATION

TxDOT’s analysis should not assume that fuel economy standards will continue to increase because the EPA is currently dismantling its policies.

RECOMMENDATION

We recommend expanding the list of community resources beyond its current scope.

5.9 Environmental Justice

5.9.3.2

“As indicated in Table 5-16, the potential effects of residential displacements could be expected to be more prevalent in the super neighborhoods of Northside/Northline, Independence Heights, Near

Northside, Greater Fifth Ward, Downtown, Second Ward, and Greater Third Ward due to the relatively high number of displacements in these super neighborhoods if the project is constructed.”

These are all predominantly Black and Brown neighborhoods with maybe the exception of Downtown. The NHHIP is continuing to perpetuate historic environmental injustice in these communities. As Richard Rothstein writes in *The Color of Law*, “in many cases, state and local governments, with federal acquiescence, designed interstate highway routes to destroy urban African American communities. Highway planners did not hide their racial motivations” (127).⁵

PLEASE CLARIFY

Given that environmental justice communities are at greater risk of toxic exposures from construction, how will they do extra to mitigate the excess of exposure in EJ communities?

PLEASE CLARIFY

In case of exposures due to the project, what emergency procedures are in place?

RECOMMENDATION

Using only one metric to measure housing stress is not sufficient. In addition to the sole metric TxDoT was planning on assessing (change in median home value), multiple metrics should be weighted and combined to form a score. Those include the demolition of naturally occurring affordable housing, demolition of subsidized housing, the expiration of tax credits for low-income housing tax credit properties, the number of new affordable homes created, the number of housing cost burdened (rent or mortgage) households.

RECOMMENDATION

According to section 5.9.3.7 monitors will only be up for a limited time, This is insufficient given the long duration of the project . These monitors should stay mounted before, during, and after construction

6 Mitigation and comments

PLEASE CLARIFY

Are the plans for mitigation detailed enough? Can we understand what the quality of life for people will be during and after construction?

⁵ Rothstein, Richard. *The Color of Law: a Forgotten History of How Our Government Segregated America*. Liveright Publishing Corporation, a Division of W. W. Norton & Company, 2018.

Appendix A: Stakeholder and Community Outreach

PLEASE CLARIFY

What equity measures have been taken in stakeholder and community outreach? Who got to talk to TxDOT more? How is feedback being taken? For communities with less literacy in English or less comfort writing, how is their feedback being captured?

PLEASE CLARIFY

Are COH engagement meetings incorporated in this appendix? If so, which ones?

PLEASE CLARIFY

On page 1-2, the document states, “TxDOT has addressed proactive efforts to ensure meaningful opportunities for public participation including activities to increase low income and minority participation”. How has this been done?

PLEASE CLARIFY

What kind of “consensus-building” did they do around the North-Hardy Planning Studies?

PLEASE CLARIFY

Sending mailings to 4000-6000 residents is insignificant given the scope and the effect this will have on a city of 4 million. TxDOT should additionally conduct a widespread social marketing educational campaign that would give people a real understanding of how the project’s construction and outcomes will impact their everyday lives. Some examples of ways to reach a wider population are through billboards, at churches, on bus routes, and through online informational ads.

A-26 “Public and low-income housing units are approximately 60 percent of the housing displacements in Seg 3”

Table 1

PLEASE CLARIFY

Houston Downtown Management District met with TxDOT almost at least 3x more than any other management district -- notice that Greater Southeast Management District only had 4 meetings even though many apartment complexes will be displaced there; North Houston District had only 2 meetings even though a significant chunk of the businesses that will be affected are in segment 1 of the highway expansion in the Greater Greenspoint area. Please explain the rationale behind and objectives for each meeting with the Houston Downtown Management District.

PLEASE CLARIFY

Super Neighborhoods along the route that didn't meet with TxDOT that call for concern: 67 (Greater Third Ward), 63 (Second Ward), 51 (Northside Village), 45 (Northside/Northline), 13 (Independence Heights), 2 (Greater Greenspoint) - Some of these areas are covered by meetings with civic clubs, but Greater Greenspoint is definitely left out. While we are concerned by the failure of TxDOT to meet with all of the above-listed civic clubs we understand that some engagement was done with civic clubs in those areas, however Greater Greenspoint was decidedly left out. Please clarify why and how Greater Greenspoint was excluded.

PLEASE CLARIFY

Businesses or business groups are meeting with TxDOT on a much more regular basis than neighborhood or civic groups. Please explain how each relationship with a business entity or group was developed.

PLEASE CLARIFY

Why hasn't TxDOT met with County Commissioners and County Judge?

PLEASE CLARIFY

The Community Impact Assessment indicates that TxDOT only had 7 meetings with individuals, despite the many thousands that will be impacted by this project. Please describe the nature of the meetings with all seven individuals, including their names and job titles, and if they'd had previous professional interactions with TxDOT.

Limited English Proficiency and Accessibility

RECOMMENDATION

The reports/website itself should be translated to Spanish, if not more languages

RECOMMENDATION

There should be simultaneous interpretation available at all public meetings; not just public hearings

RECOMMENDATION

If there was an express need for interpretation to Swahili and Haitian Creole at HHA meetings, they should have it at TxDOT meetings and in all TxDOT reports, etc

RECOMMENDATION

TxDOT met with the owner and English-speaking brother to discuss the option of applying for advance acquisition of the property, among other topics” - they should have interpretation available if people can’t make informed decisions about their property in English

5.10 Limited English Proficiency

PLEASE CLARIFY

Are they sending out multilingual notifications based on the neighborhoods they are displacing? If so, who is in charge of this process? Will their relocation counselors be multilingual?

RECOMMENDATION

Reports should be translated to Spanish (and other languages) and readily available

RECOMMENDATION

Public meetings should have simultaneous interpretation.

Appendix B: Design Changes Resulting from Stakeholder Input

RECOMMENDATION

Stakeholder input had a heavy emphasis on downtown business interests. TxDOT should thoroughly consult with each of the listed environmental justice communities to ensure that it will make changes that benefit the interests of those most exposed to the harms that have resulted from prior highway construction and will result from the construction associated with the NHHIP.

Tables

5-1 Total Displacements in Project Area

PLEASE CLARIFY

How many of the multi-family and single family displacements impact protected classes?

5-2 Multi-family, Single-family, and Occupancy Type for Residential Displacements

PLEASE CLARIFY

Renters, especially renters living in multifamily apartments will be disproportionately impacted by this move please explain if and how this disproportionate impact was reconciled in the development of the preferred alternative.

5-7 Clayton Home and Kelly Village Impacts

WE RECOMMEND

TxDoT should replace with 1:1 units before Harvey and permanent public housing

WE RECOMMEND

Given Houston's affordability crisis, TxDoT should preserve affordability long-term through meaningful planned giving to area CDC and CRCs that invest in housing for those making below 30% of area media income.

5-16 and 5-17 Residential Displacements and Housing Values in Environmental Justice Super Neighborhoods

PLEASE CLARIFY

As shown in Table 5-17, the environmental justice communities exhibiting the strongest indications of affordable housing problems (as measured by the sole and insufficient indicator selected by TxDoT) are Independence Heights, Greater Third Ward, Fifth Ward, Second Ward and Near Northside (the top four, in descending order). Since, "in consideration of the impacts of the Preferred Alternative, TxDOT intends to support affordable housing initiatives in those communities most affected," please clarify how TxDOT will support affordable housing initiatives, if this support is in good faith or codified in

contract agreement with relevant entities, how deep the affordability will be. If support is being provided for “hard units” of housing please share unit characteristics, affordability, and location.

5-18 Community Facilities and Businesses Utilized by Environmental Justice Populations

RECOMMENDATIONS

Many seniors rely on METRO and METRO Lift services for mobility, TxDOT must collaborate both with the operators of Pecan Grove and METRO to ensure continuity of service.

RECOMMENDATIONS

AVANCE Training Center should receive a relocation counselor without having to make a formal request and that counselor should take pains to help them locate a transit-accessible location(s) nearby.

RECOMMENDATIONS

Given that Casa Quetzal is a detention center for migrant children and that the owner/operator Southwest Key has **not** shown itself to be a good steward of the children detained, we recommend that child advocates be involved in relocation discussions.

RECOMMENDATIONS

Yen Huong Bakery should receive a relocation counselor without having to make a formal request and that counselor should take pains to help them locate a transit-accessible location(s) nearby. Given that the property owner has limited English proficiency, TxDOT should ensure that the relocation counselor is competent in the property owner’s preferred language or provide interpretation services for all interactions and important documents.

RECOMMENDATION

TxDOT should coordinate with the operators of Woodland Christian Towers and METRO to ensure clear communication to residents about changes in service.

RECOMMENDATION

TxDOT should coordinate with the operators of La Michoacana Meat Market (grocery store) and METRO to ensure clear communication to patrons about changes in service.

RECOMMENDATION

TxDOT should coordinate with the operators of El Rancho Supermercado (grocery store) and METRO to ensure clear communication to patrons about changes in service.

RECOMMENDATION

TxDOT should coordinate with the operators UT Health Women Infants Children (WIC) Program (Greenspoint Clinic) to provide paratransit between the displaced stop and the clinic. This will reduce risk to patients who may be made to walk a longer distance with small children or while ill as a result of the elimination of an adjacent bus stop.

RECOMMENDATION

As with Pecan Grove, the residents of the Law Harrington Senior Living may rely on METRO and METRO Lift services for mobility, TxDOT must collaborate both with the operators of Law Harrington Senior Living and METRO to ensure continuity of service.

RECOMMENDATION

Rebuilding of the Tenemos Place Apartments should be a 1:1 rebuilding.

RECOMMENDATION

SEARCH Homeless Services receive a relocation counselor without having to make a formal request and that counselor should take pains to help them locate a transit-accessible location(s) nearby.

RECOMMENDATION

Fatima House should receive a relocation counselor without having to make a formal request and that counselor should take pains to help them locate a transit-accessible location(s) nearby.

RECOMMENDATION

Goodwill Missionary Baptist Church should receive a relocation counselor without having to make a formal request and that counselor should take pains to help them locate a transit-accessible location(s) nearby.

RECOMMENDATION

Loaves and Fishes Magnificat Houses Ministries should receive a relocation counselor without having to make a formal request and that counselor should take pains to help them locate a transit-accessible location(s) nearby.

RECOMMENDATION

Helping Hands Charity should receive a relocation counselor without having to make a formal request and that counselor should take pains to help them locate a transit-accessible location(s) nearby.

RECOMMENDATION

Greater Mount Olive Missionary Baptist Church should receive a relocation counselor without having to make a formal request and that counselor should take pains to help them locate a transit-accessible location(s) nearby.

RECOMMENDATION

Given the historical significance of the following locations as community centers it is our recommendation that the project be amended to **prevent** their displacement: Goodwill Missionary

Baptist Church, Greater Mount Olive Missionary Baptist Church, Kim Son, Faith Tabernacle Church, Centro Cristiano Church, Iglesia Evangelica Vida.

6-1 Mitigation and Commitments Required by Policy/Regulation

See comments on Draft Cumulative Impacts Technical Report.

6-2 Mitigation and Commitments Not Required by Policy/Regulations

See comments on Draft Cumulative Impacts Technical Report.

6-3 Other Beneficial Commitments

RECOMMENDATION

We appreciate the development of a stormwater detention facility from the Love's Truck Stop and recommend that in the development of this facility TXDoT remediate harmful residue from years of trucking activity.

Image Appendix



An image from the Kim Son Jefferson location which the preferred alternative will displace.
Source: Kim Son Website



Four houses on Grayson St. in the Greater Fifth Ward neighborhood of Houston are in danger of being torn down during the expansion of I-45. © Miguel Gutierrez Jr./The Texas Tribune



Images from Miguel Gutierrez Jr. /Texas Tribune depicting “naturally occurring” affordable housing, subsidized public housing, and a church all due to be demolished during the construction of the preferred alternative.

Bibliography and Recommended Reading

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