

SUPERNEIGHBORHOOD 22

WASHINGTON AVENUE COALITION - MEMORIAL PARK

TO: FEDERAL RAILROAD ADMINISTRATION

07 January 2015

**RE: COMMENTS IN RESPONSE TO TEXAS CENTRAL RAILWAYS
DALLAS-HOUSTON HIGH SPEED RAIL PROPOSAL**

The Washington Avenue Coalition - Memorial Park Superneighborhood Council (SN22) does not oppose development of high speed rail (HSR) service between Dallas and Houston.

SN22 recognizes the increasing need for, and fully supports development of, multimodal public transportation alternatives. SN22 opposes any HSR route inside Houston's 610 Loop that is not located within an existing high-speed and high-capacity transit corridor, including both of the currently proposed routes. SN22 prefers selection of a route that would begin and end outside Loop 610.

The UPRR terminal subdivision, one of Texas Central Railway's (TCR) preferred routes, transects the entire length of the SN22 area passing through multiple established neighborhoods.

This routing will be detrimental to a state recognized Cultural Arts District and the city designated High First Ward Historic District. Demand by concerned residents led to interaction with the City of Houston and UPRR to activate a Rail Quiet Zone for this route in late 2011. This route currently is not grade separated and it intersects a number of major thoroughfares that provide access to the freeway system. SN22 strongly encourages an open conversation with the residents and businesses adjacent to or within the proposed route area.

SN22 developed and circulated a transportation plan during 2009 - 2010 in anticipation of the need for future expansion of this rail corridor.

That plan proposed trenching approximately 3 miles of this route to reestablish neighborhood connectivity and provide for additional rail capacity. The plan was reviewed by the Gulf Coast Rail District, City of Houston representatives, and it is referenced in the Houston-Galveston Area Council 2012 Intermodal Terminal Access Study. No entities took action to implement the plan and subsequently new residential and commercial development has occurred that at some points now constrains this UPRR right-of-way width to 50 feet or less. It is our understanding that a dual track HSR system requires 80 to 100 feet of dedicated right-of-way implying the need to take property for expansion.

SN22 finds it a matter of extreme concern that the only one public scoping meeting for this HSR project was held within the city of Houston.

Providing citizens with information and the opportunity to comment on TCR's significant transportation proposal is essential to project transparency, but that meeting was held at a location and time that made it difficult for residents from neighborhoods most impacted by the two selected "preferred routes" to attend. Since HSR is a new transportation concept for Texas and TCR is partnering with FRA and TxDoT, the vetting of proposed routes in the urban area should include a 3 part scoping process with initial presentations located at a venue central to the impacted communities.

SN22 shares with adjacent communities the belief that implementation of HSR in Texas must be thoughtfully integrated for efficient connectivity to other modes of public transit.

To build interurban consensus SN22 representatives met with representatives of other neighborhood areas likely to be impacted by the HSR routing choices - Superneighborhood 12, Oak Forest, and the Near North Side.

TCR's proposed Dallas - Houston route cannot be simply a stand alone HSR system.

To be successful and sustainable, consideration must be given to how riders access stations and travel from stations to their final destinations. Currently in Houston multimodal connectivity options are severely limited, and as the result of recent federal legislative and local elective action, further expansion of the METRO Rail system will be delayed for many years.

TCR's current plan to route the system to terminate in Houston's Central Business District (CBD) is a cause of significant concern for residents of our urban neighborhoods.

The CBD is but one of many major activity and commercial centers that would be likely destinations for users of HSR service. Without the option of frequent, efficient, high quality transit service, HSR users will be forced to rely on personal or hired vehicles to reach final destinations outside the CBD. This will further increase congestion on freeways as well as urban thoroughfares, and compound our area's current air quality problems.

How and where a HSR system is routed must not be dictated solely by construction cost efficiency and user convenience.

Attention to input from the community members that will be affected by the routing choices must be considered and respected. The preferable routing solution for our urban neighborhoods would be HSR that terminates at a transit center outside the urban core where enhanced multi-modal connectivity to the CBD as well as all other major activity centers could be provided, and future routes might extend to additional regional municipalities. Establishing such a transit center hub would offer great opportunity for economic development, provide space needed for HSR maintenance facilities, and incentivize local employment.

The choice to route this HSR project through or adjacent to established residential neighborhoods and businesses raises the specter of environmental and social injustice.

It is highly questionable that a private enterprise operating for financial gain and serving a select clientele should be allowed to assume common carrier status and take property by eminent domain. Such takings would inflict hardships on members of a community that would not directly benefit from the service to be provided. Although this project is to be privately funded, if it is serving the common good to use eminent domain for the purpose of public transportation, it's routing should be determined with approval from an informed citizenry.

The addition of HSR service along this route will impose a source of visual and noise pollution that decreases property values for nearby residents.

TCR's presentations have included no graphics or photographs to inform residents of how the necessary support infrastructure will engage with and incorporate into the affected areas. SN22 considers the massive structural elements required for HSR inappropriate for an established residential and business environment. Such grade-separated elevated structures would best be incorporated into existing high-volume, high-speed transportation corridors. Should termination in the CBD ultimately be deemed essential, our neighborhoods request that the currently "preferred" urban route options be abandoned and that the IH45/610/Hardy route be reconsidered, or that HSR be sited within TxDOT's IH10 or 610 North Loop rights-of-way.

SN22 appreciates TCR's effort in bringing this important regional mobility initiative forward.

However, SN22 has great concern about how this project could negatively impact our established urban neighborhoods, and we strongly encourage improved transparency as it progresses.

Respectfully submitted,



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President
SN 22 Council

Copies to: Michael Johnsen, Federal Railroad Administration
US Congresswoman Sheila Jackson Lee
State Representative Jassica Farrar
State Representative Carol Alvarado
State Senator Sylvia Garcia
Alan Clark, Houston-Galveston Area Council
Michael W. Alford, P.E., TxDOT Houston District
Maureen Crocker, Houston-Galveston Rail District
Houston Mayor Annise Parker
Patrick Walsh, Director Houston Planning & Development
City of Houston Council Member Ellen Cohen
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