

Final Section 4(f) Evaluation

North Houston Highway Improvement Project

From US 59/I-69 at Spur 527 to I-45 at Beltway 8 North

Texas Department of Transportation,

Houston District

Harris County

CSJ 0912-00-146

Prepared for the Federal Highway Administration

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1 INTRODUCTION

This document is the Final Section 4(f) Evaluation for the North Houston Highway Improvement Project (NHHIP). This evaluation was prepared by the Texas Department of Transportation (TxDOT) to satisfy the requirements of Section 4(f) of the Department of Transportation (USDOT) Act of 1996. In 1983, Section 4(f) of the USDOT Act was codified as 49 United States Code [USC] 303, but this law is still commonly referred to as Section 4(f). This evaluation was also prepared in accordance with the Federal Highway Administration (FHWA) implementing regulations for Section 4(f) codified in 23 Code of Federal Regulations (CFR) Part 774, and the FHWA's Section 4(f) Policy Paper (July 20, 2012).

Section 4(f) and its implementing regulations prohibit the FHWA from using publicly owned land of a public park, recreation area, or wildlife and waterfowl refuges of national, state or local significance, or land of a historic site of national, state or local significance for transportation projects unless there is no feasible and prudent alternative to using the land and the project includes all possible planning to minimize harm to the property resulting from the use, or the impact is *de minimis*. Where the use of Section 4(f) property for a transportation project cannot be avoided, FHWA may approve, from among the remaining alternatives that use Section 4(f) property, only the alternative that causes the least overall harm in light of the statute's preservation purpose. The alternative selected must include all possible planning to minimize harm to Section 4(f) property. If the assessment of overall harm finds that two or more alternatives are substantially equal, FHWA can approve any of those alternatives.

The "use" of a protected Section 4(f) property can be classified as a direct use, a temporary occupancy, or a constructive use. In addition, a finding of *de minimis* impact can be made if the use of a Section 4(f) resource is determined to be minimal. These terms are defined below.

- **Direct Use.** A direct use of a Section 4(f) resource takes place when the land is permanently incorporated into a transportation facility.
- **Temporary Occupancy.** A temporary occupancy results in a use of a Section 4(f) property when there is a temporary impact to the Section 4(f) property that is considered adverse in terms of the preservationist purposes of the Section 4(f) statute.
- **Constructive Use.** Constructive use occurs when the transportation project does not incorporate land from a Section 4(f) property, but the project's proximity impacts are so severe that the protected activities, features, or attributes that qualify a resource for protection under Section 4(f) are substantially impaired. Substantial impairment occurs only when the protected activities, features, or attributes of the resource are substantially diminished.
- ***De Minimis*.** A finding of *de minimis* impact may be made for historic sites when no historic property is affected by the project or the project will have "no adverse effect" on the historic property in question. For parks, recreation areas, and wildlife and waterfowl refuges, a finding of *de minimis* impact may be made when impacts will not adversely affect the activities, features, and attributes that qualify the resource for protection under Section 4(f). A *de minimis* impact finding may be made without the evaluation of avoidance alternatives typically required in a Section 4(f) evaluation.

The proposed action (Preferred Alternative) includes the addition of four managed express (MaX) lanes on Interstate Highway 45 (I-45) from Beltway 8 North to Downtown Houston, including reconstruction of mainlanes and frontage roads, and the rerouting of I-45 in the Downtown area to be parallel with I-10 on the north side of Downtown and parallel with U.S. Highway (US) 59/I-69 on the east side of

Downtown. The existing elevated I-45 roadway along the west and south sides of Downtown would be removed, as would the portion of I-45 (Pierce Elevated) between Brazos Street and US 59/I-69. Community groups have expressed an interest in having the Pierce Elevated left in place for future use and redevelopment; however, this use for the structure is not proposed by TxDOT, would not be funded or undertaken by TxDOT, and is not evaluated in the Final EIS. In the event that these groups make keeping the Pierce Elevated in place a viable option, TxDOT would then conduct a reevaluation and solicit public input to evaluate the impacts of leaving it in place. Both I-10 and US 59/I-69 within the proposed project area would be realigned to eliminate the current roadway curvature, and four I-10 express lanes would be added between I-45 and US 59/I-69.

The proposed project is listed in the Regional Transportation Plan (RTP) for 2045 produced by the Houston-Galveston Area Council. The proposed NHHIP includes three project segments which are discussed in Section 2.2. Segment 3 is the only one of the three contiguous segments in which the Proposed Action would result in a use Section 4(f) properties and is, therefore, the focus of this Section 4(f) evaluation. Additionally, Segment 3 has been approved by the TxDOT Commission for further development via minute order 115260 passed July 26, 2018.

The parks that would be adjacent to or nearby the project are in an urban setting and in proximity to existing transportation facilities. The Proposed Action would not substantially impair the activities, features, or attributes of the parks. Noise barriers are proposed as abatement measures for predicted traffic noise impacts to some parks, where reasonable and feasible (see the Traffic Noise Technical Report for more details).

TxDOT used a phased approach to identify, document, and evaluate historic properties in the project's APE. In accordance with provisions of 36 CFR 800, TxDOT historians conducted reconnaissance level investigations between 2015 and 2019 to identify historic properties in the Area of Potential Effect (APE) for the Reasonable Alternatives, including the Proposed Action. TxDOT consulted with the Texas State Historic Preservation Officer (SHPO) and determined the APE as the existing right-of-way (ROW) where no new ROW is proposed; 150 feet from proposed new ROW and easements and in areas of any newly proposed elevated structures which would represent a grade increase of 5 feet or more from ground level; and 300 feet from proposed ROW in areas with a newly proposed grade increase of at least 10 feet, areas of a proposed multi-level or elevated component, or other certain high probability areas.

The SHPO and the Advisory Council on Historic Preservation (ACHP) concurrences on determinations of eligibility and effect for this project, as well as the proposed mitigation process are embedded in the Section 106 Programmatic Agreement (PA) for this project, which is in Appendix R of the Final Environmental Impact Statement (Final EIS). The Texas Historical Commission (THC) and TxDOT coordination letters referenced in this report are in Attachment F of this evaluation.

In accordance with 23 CFR 774, this Section 4(f) evaluation provides an explanation stating that there is no feasible and prudent alternative to the use of the historic properties including the Houston Warehouse Historic District, Carlisle Plastics North Warehouse, Readers Distributors Warehouse, Cheek Neal Coffee Company Building property, and Rossonian Cleaners, and the proposed action includes all possible planning to minimize harm to the historic sites resulting from such use. Based on the seven factors for identifying the alternative with the least overall harm, it was determined that Alternative 11 would cause the least overall harm in light of Section 4(f)'s preservation purpose.

2 DESCRIPTION OF THE PROPOSED ACTION

A brief description of the proposed project is provided in Section 1. This section provides details about the proposed project including purpose and need, logical termini, descriptions of the existing facility and proposed project, and descriptions of the build and no-build alternatives.

2.1 Purpose and Need

In general, transportation improvements are needed within the NHHIP area in Harris County, Texas because the I-45 facility currently operates near capacity, resulting in congestion during peak and off-peak periods. Future transportation demand from projected population and economic growth is expected to place a greater strain on the existing facility. The population of the eight central counties of the 13-county Houston-Galveston Area Council (H-GAC) region (the Houston-Galveston region) is expected to grow considerably over the next 25 years. According to H-GAC, the region had 6.5 million residents and 3.2 million jobs in 2015. By 2040, the region is expected to add 3.5 million more people for a total of approximately 10 million residents. That is an increase of 54 percent over 25 years, or a 1.75 percent growth each year. Similarly, for jobs, the region is expected to create an additional 1.3 million jobs for a total of 4.5 million. This is an increase of 41 percent or 1.4 percent growth for each year. Also, transportation improvements for I-45 are needed because the existing facility does not meet current TxDOT design standards, and drainage improvements are necessary to improve storm water drainage in some areas during heavy rainfall events. The purpose of the proposed NHHIP is to help manage the existing and projected transportation problems in the area of the NHHIP to improve mobility and safety.

Table 2-1 summarizes the needs (problems) and purposes (solutions) of the project. Detailed information about the purpose and need for the proposed NHHIP is in Section 1 of the Final EIS.

Table 2-1. Summary of Need and Purpose for Proposed Action

Need	Purpose
Congestion	
The roadway facility does not provide adequate capacity for existing and future traffic demands, resulting in congestion, longer travel times, and reduced mobility.	Manage I-45 traffic congestion in the NHHIP area through added capacity, options for high-occupancy vehicle (HOV) lanes, and improved operations.
The average daily traffic volumes on I-45 in the areas from US 59/I-69 to I-10 and I-610 to Beltway 8 North are projected to increase by approximately 40 percent between 2015 and 2040. The average daily traffic volume on I-45 between I-10 and I-610 is projected to increase by approximately 15 percent during the same period. Congestion on I-45 currently ranges from “moderate” to “serious” conditions. Without improvements, I-45 will have “serious” to “severe” congestion by 2040, as measured by traffic volume and capacity.	Improve mobility on I-45 between US 59/I-69 and Beltway 8 North by accommodating projected population growth and latent demand in the project area.
The reversible HOV lane on I-45 serves traffic in only one direction during the peak periods and is unused for large portions of the day. During peak hours, the HOV lane congestion is classified as “tolerable.” Forecasts for commuter service indicate that even with parallel high-	Provide expanded transit and carpool opportunities with two-way, all-day service on MaX lanes, and access to METRO Park & Ride facilities.

Need	Purpose
capacity transit in the corridor, managed lanes would be needed to support commuter traffic and express bus service.	
Design Standards/Safety	
Portions of I-45 do not meet current roadway design standards, creating a traffic safety concern.	Bring I-45 up to current design standards with shoulders and auxiliary lanes to improve safety and operations.
Roadway design deficiencies also include inadequate storm water drainage in some locations. Intense rainfall causes high water levels at the I 45/I-10 underpass and on the outside lanes and frontage roads between Parker Road and Gulf Bank Road. I-45 would not operate effectively as an evacuation route with high water closures, especially during hurricane evacuations when high rainfall events are likely.	Eliminate areas of flooding on the I-45 mainlanes.
All sections on I-45 show a considerably higher crash rate than the statewide average crash rate.	Provide an improved facility with additional capacity and current design standards to reduce the crash rate.
Emergency Evacuation	
I-45 is a designated evacuation route in case of major storm, hurricane, or chemical spill. At its present capacity, evacuation effectiveness would be limited in the event of a hurricane or other regional emergency.	Expand capacity for emergency evacuations by providing proper design and flexible operations.

2.2 Project Location

The proposed NHHIP is located in Harris County, Texas and includes improvements to I-45, I-10, and US 59/I-69. To facilitate in the design and analysis of alternatives, the project area was divided into three segments (Figure 2-1). In general, the segment limits are (from north to south): Segment 1: Beltway 8 North to I-610, Segment 2: I-610 to I-10, and Segment 3: Downtown Loop System (I-45, I-10, and US 59/I-69).

The I-45/Beltway 8 North interchange is a frequent trip destination, given its proximity to residential neighborhoods and places of employment in the Greenspoint area. The I-45/Beltway 8 North interchange does not need any redesign in order to implement the proposed project, as it was completed in 1999 and meets current design standards. Downtown Houston is a major employment center and trip destination and is therefore a logical southern end point. The project termini, therefore, are rational endpoints identified for construction and for review of environmental impacts.

Segment 3 is the only one of the three contiguous segments in which the Preferred Alternative would adversely affect Section 4(f) properties and is, therefore, the only segment of the project discussed in this Section 4(f) evaluation.



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Figure 2-1: NHHIP Corridor and Project Segments

2.3 Existing and Proposed Facilities

The following describes the existing I-45 within the Segment 3 project area and the proposed action (the Preferred Alternative).

2.3.1 Existing Facility

Segment 3: Downtown Loop System (I-45, US 59/I-69, and I-10)

The Downtown Loop System consists of three interstate highways that create a loop around Downtown Houston. I-45 forms the western and southern boundaries of the loop and is known locally as the Pierce Elevated because it partially follows the alignment of Pierce Street. I-10 forms the northern boundary of the loop, and US 59/I-69 forms the eastern boundary of the loop. The loop includes three major interchanges: I-45 and I-10, I-10 and US 59/I-69, and US 59/I-69 and I-45. The interchange of US 59/I-69 and Spur 527 is located southwest of Downtown Houston.

I-45 along the western and southern sides of Downtown consists of six elevated general purpose lanes (three lanes in each direction) within a variable right-of-way (ROW) that is typically 205 feet to 320 feet wide. I-10 north of Downtown, between I-45 and US 59/I-69, consists of six general purpose lanes (three lanes in each direction) within an existing ROW width of 420 feet. US 59/I-69 along the east side of Downtown consists of six general purpose lanes (three lanes in each direction) within an existing ROW width of 225 feet. US 59/I-69 south of Downtown from I-45 to Spur 527 has eight general purpose lanes (four in each direction). Generally, local streets serve as one-way frontage roads within Segment 3, except near the I-10 and US 59/I-69 interchange, where the frontage roads are discontinuous. The length of Segment 3, which includes the Downtown Loop System, is approximately 13.1 miles, and the existing ROW is approximately 638 acres.

2.3.2 Proposed Action

Segment 3: Downtown Loop System (I-45, US 59/I-69, and I-10)

The Preferred Alternative would reconstruct all the existing interchanges in the Downtown Loop System and reroute I-45 to be parallel to I-10 on the north side of Downtown and parallel to US 59/I-69 on the east side of Downtown. Access to the west side of Downtown would be provided via “Downtown Connectors” that would consist of entrance and exit ramps for various Downtown streets. A section of the Downtown Connectors would be below-grade (depressed) between approximately W. Dallas Street to Andrews Street. The existing elevated I-45 roadway along the west and south sides of Downtown would be removed. The portion of I-45 (Pierce Elevated) between Brazos Street and US 59/I-69 could be left in place for future use and redevelopment by others; however, an alternative use for the structure is not proposed or evaluated as part of this project.

To improve safety and traffic flow in the north and east portions of Segment 3, portions of both I-10 and US 59/I-69 would be realigned (straightened) to eliminate the current roadway curvature. I-45 and US 59/I-69 would be depressed along a portion of the alignment east of Downtown. South of the George R. Brown Convention Center, the rerouted I-45 would begin to elevate to tie to existing I-45 southeast of Downtown, while US 59/I-69 would remain depressed as it continues southwest toward Spur 527. US 59/I-69 would be widened from eight to twelve general purpose lanes between I-45 and SH 288, and would be reconstructed to ten general purpose lanes from SH 288 to Spur 527.

The four proposed I-45 MaX lanes in Segments 1 and 2 would terminate/begin in Segment 3 at Milam Street/Travis Street, respectively. I-10 express lanes (two lanes in each direction) would be located

generally in the center of the general purpose lanes within the proposed parallel alignment of I-10 and I-45 on the north side of Downtown. The I-10 express lanes would vary between being elevated and at-grade.

New ROW to the east of the existing US 59/I-69 along the east side of Downtown would be required to accommodate the proposed realigned I-45. A new continuous southbound access road would be provided adjacent to US 59/I-69 and would tie to existing Hamilton Street on the south side of the Convention Center. The existing St. Emanuel Street would serve as a northbound access road. The project ROW would include areas to be developed as storm water detention sites. Approximately 160 acres of new ROW would be required, the majority of which would be for the I-10 and US 59/I-69 realignments (straightening) and to construct the proposed I-45 lanes adjacent to US 59/I-69 along the east side of Downtown.

The Preferred Alternative provides a structural “cap” over the proposed depressed lanes of I-45 and US 59/I-69 from approximately Commerce Street to Lamar Street. There would also be a highway cap over the depressed lanes of US 59/I-69 between approximately Main Street and Fannin Street, and in the area of the Caroline Street/Wheeler Street intersection. Future use of the highway cap areas for another purpose would require additional development and funding by entities other than TxDOT.

See Attachment A for layouts and sample typical sections for the Preferred Alternative (Proposed Action).

2.4 Alternatives

In 2011, TxDOT began developing and evaluating alternatives for the NHHIP, including build alternatives and the no-build alternative. Subsequently, following public comment on the purpose and need for the proposed project and the various alternatives, and evaluation of the alternatives (based on engineering, traffic, and environmental criteria) TxDOT revised some of the build alternatives and developed additional build alternatives. The sequence of the alternatives development and evaluation was: universe of alternatives, preliminary alternatives, Reasonable Alternatives, proposed recommended alternative, and finally, the preferred alternative. The no-build alternative was evaluated in each round of evaluation and was a baseline to compare with the build alternatives. Section 2 of the Draft Environmental Impact Statement (Draft EIS) describes the alternative analysis process and results in detail. Generally, the build alternatives include Transportation Systems Management (TSM) upgrades, addition of travel lanes, construction and removal of ramps, realignment of I-45 in Segment 3, modification of roadway connections, construction of managed lanes, elevating and depressing roadway sections, tunnel options, and converting the Downtown loop to a one-way system.

Three alternatives for Segment 3 were studied in detail in the April 2017 Draft EIS for the NHHIP. These alternatives were called the Reasonable Alternatives and one was identified by TxDOT as the Proposed Recommended Alternative (original Alternative 11). TxDOT revised the Proposed Recommended Alternative after receiving public comment on the Draft EIS, and the revised alternative (Alternative 11) is the Preferred Alternative. See Attachment A for maps and typical sections for the build alternatives.

3 DESCRIPTION OF SECTION 4(f) PROPERTIES

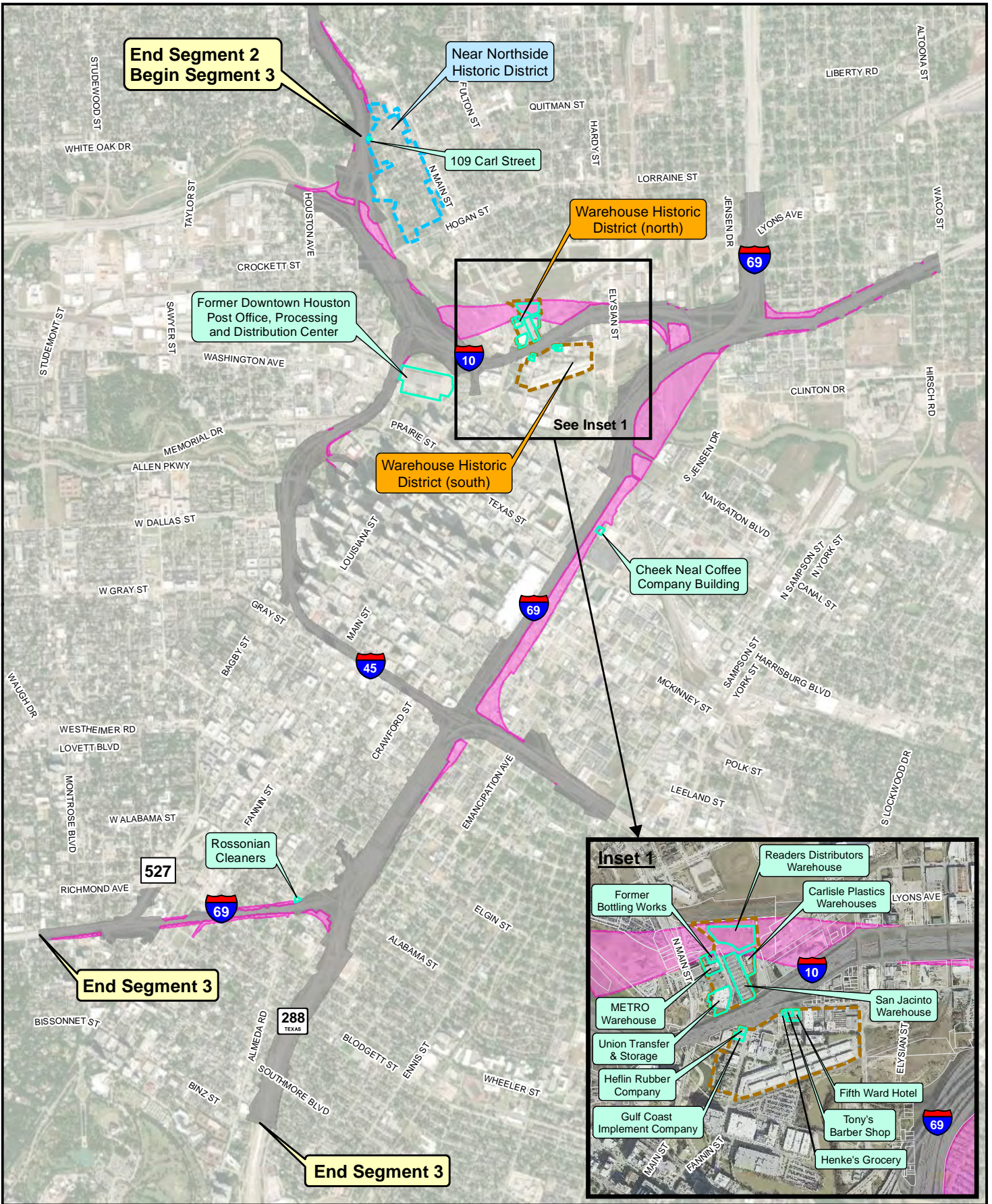
TxDOT used a comprehensive, multi-phase process to develop and evaluate a full range of project alternatives for highway improvements in the project corridor. Detailed information regarding the alternative analysis process is in Section 2 of the Final EIS. TxDOT also employed a phased approach to identify and evaluate potential historic properties and the effect of the NHHIP on historic properties. For the initial screening phase (which examined 30 build alternatives, 10 for each of the three project segments), a basic yes/no determination was made for the presence of community parks, cemeteries, and cultural resources. For the secondary screening phase (which examined 18 preliminary alternatives, six for each project segment), the evaluation took into account the number of NRHP-listed properties impacted by the alternative and other direct impacts to other known cultural resources.

The Section 4(f) resources considered in this evaluation are located in Segment 3 within the study area. The historic resources described in this section are shown in Figure 3-1 and the park resources are shown in Figure 3-2. Sections 3.1 through 3.5 describe the historic resources and Section 3.6 describes the parks. This section does not include descriptions of Section 4(f) historic resources and parks located within Segment 1 or Segment 2 because the Proposed Action would not adversely affect those resources. Section 3.6.2.4 includes the bikeways which are excepted from Section 4(f) requirements because they are part of the local transportation system.

Section 4 of this report further analyzes those Section 4(f) properties within Segment 3 that will be adversely impacted by the Proposed Action.

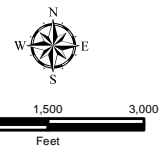
For additional detail on Section 4(f) resources and their impacts, refer to Final Historical Resources Survey Report (September 2019).

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Legend

- Existing Right-of-Way
- Proposed ROW (Preferred Alternative)
- NRHP-listed district
- NRHP-determined eligible district
- NRHP Resource

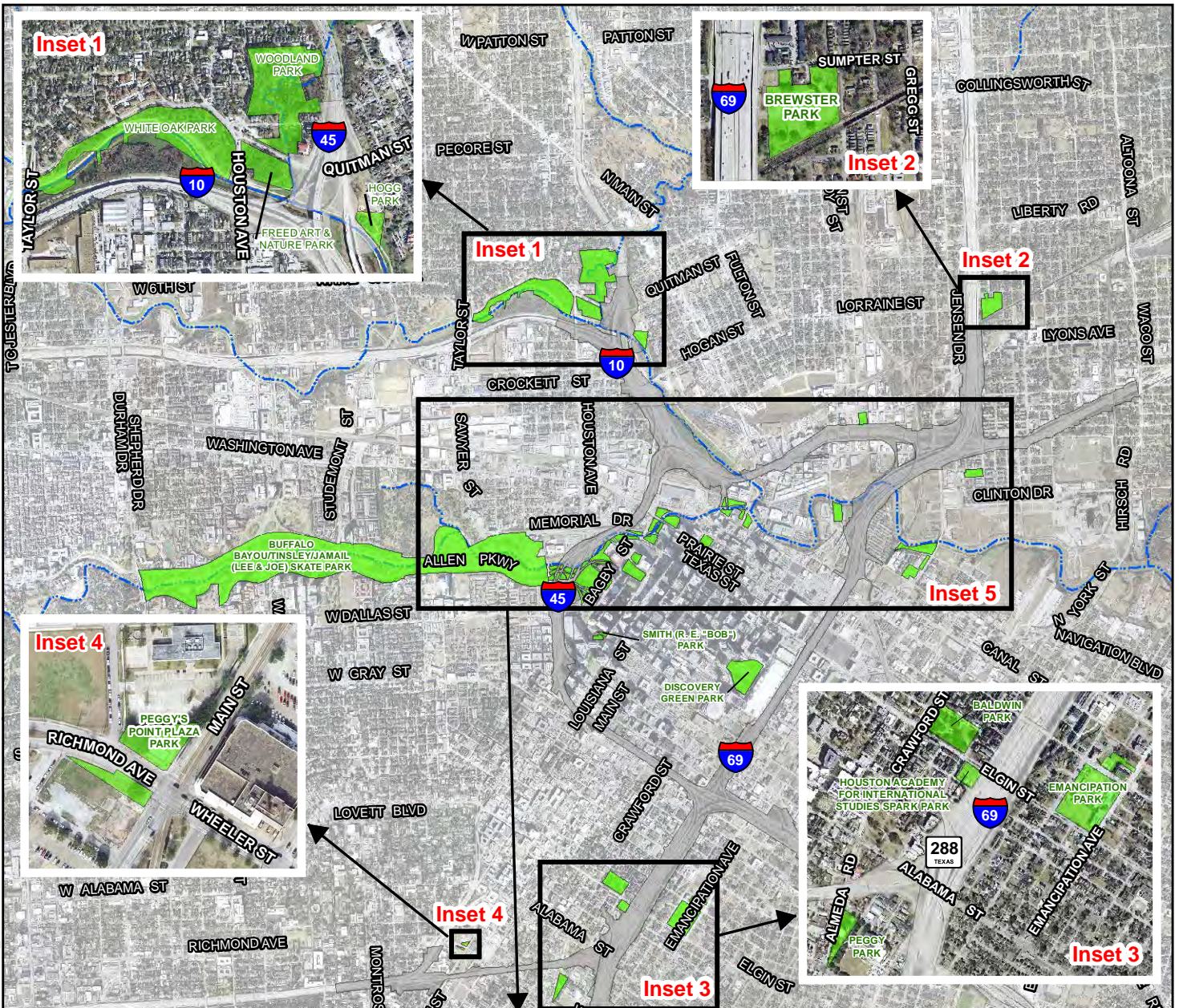


North Houston Highway Improvement Project

**Section 4(f) Resources
 Segment 3 Historic Resources**

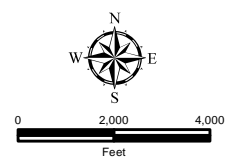


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Legend

- Existing ROW
- Public Parks



**North Houston
Highway Improvement Project**

**Section 4(f) Properties
Segment 3 Public Parks**



3.1 Houston Warehouse Historic District

The Houston Warehouse Historic District, as resurveyed and delineated in a 2016 SWCA Environmental Consultants, Inc. survey, is comprised of about 40.7 acres on either side of I-10, just north of downtown Houston. The report is on file at THC. The existing I-10 ROW is not included within the district boundaries, making the historic district discontinuous. The north portion of the district is roughly bounded by one-half block west of Vine Street to the west, the Union Pacific Railroad to the north, Walker Street to the east, and Providence Street and I-10 to the south. The south portion is roughly bounded by one-half block west of San Jacinto Street to the west, Rothwell Street and Nance Street to the north, McKee Street to the east, and the Union Pacific Railroad to the south. The historic district contains a total of 39 resources, of which 31 are contributing to the district. A map showing the location of the Houston Warehouse Historic District is in Attachment B (page B-1) and photographs of the contributing resources are in Attachment C.

A NRHP-eligible historic district, focused on late-nineteenth- and early-twentieth-century warehouses, was first identified and recommended in this area as part of a 1992 NRHP Multiple Property Documentation Form (MPDF) and related historic resources survey. Field surveys and subsequent Section 106 coordination for a proposed METRO transit center in 2006 confirmed the continued presence and NRHP eligibility status of the historic district.

In 2016 the full extent of the 1992 MPDF area was resurveyed and re-evaluated for NRHP eligibility in conjunction with a Harris County Flood Control District (HCFCD) project. The 2016 resurvey identified two historic warehouse districts, including the Houston Warehouse Historic District encompassing the boundaries described in the previous paragraph. The report is on file at THC. The other historic warehouse district is outside the APE of each of the Reasonable Alternatives. The Houston Warehouse Historic District was determined eligible for listing in the NRHP under *Criterion A* in the areas of Commerce and Industry and *Criterion C* in the area of Architecture. The historic district's period of significance is between 1883 and 1970, corresponding to the construction date of the district's earliest extant building to the approximate date of I-10 construction through the historic district. The Houston Warehouse Historic District is significant as a cohesive and intact grouping of early-twentieth-century railroad-oriented warehouses and mid-twentieth-century auto-related shipping warehouses. This determination of NRHP eligibility was confirmed in TxDOT's consultation with SHPO regarding historic resources surveys conducted for the NHHIP in 2017 and 2018 and subsequent SHPO concurrence (THC 2018, THC 2019).

The properties discussed in Section 3.1.1 to Section 3.1.11 are located in the Houston Warehouse District and include individually NRHP-eligible resources, contributing resources to the NRHP-eligible Houston Warehouse Historic District which are not individually NRHP-eligible, and resources which are both individually eligible for listing in the NRHP and contributing resources to the NRHP-eligible Houston Warehouse Historic District

3.1.1 San Jacinto Warehouse

The San Jacinto Warehouse at 1125 Providence Street is located on the south side of the proposed I-45/I-10 ROW. This property is a one-story warehouse building constructed in 1929. It is constructed of reinforced concrete and is clad with variegated red brick. It is composed of 13 connected units, each with front and rear triangular red brick parapets. A long concrete loading dock extends the length of the building's east side. This building was designed with multiple units for the purpose of leasing

space to small wholesale businesses that used both rail and trucking to transport goods. Five of the building's original 18 warehouse units were removed for the construction of I-10 in the late 1960s.

The San Jacinto Warehouse is an unusual early-twentieth-century example of a warehouse building designed for lease to multiple small businesses that were increasingly using trucks to transport goods in combination with rail. The building has a distinctive form that is unusual for the period and reflects its function. The design elements of the building are also distinctive. These elements include the building's red brick cladding, triangular parapets, steel-frame windows, and full-length loading dock. Although the building and its setting have been altered with the late-1960s construction of I-10, remaining units retain the significant elements of the original design and are surrounded by historic-age warehouse buildings. In a 2016 survey conducted by SWCA Environmental Consultants, Inc. for the Harris County Flood Control District, the San Jacinto Warehouse was determined to be individually eligible for listing in the NRHP and was also determined to be a contributing resource to the NRHP-eligible Houston Warehouse Historic District.

3.1.2 Former Bottling Works

The former Bottling Works building is located at 1120 Naylor Street, on the southwest corner of Vine Street and Naylor Street. It is a c.1930, one-story, rectangular-plan building with concrete block exterior. Brickwork is present at building corners and at the primary door surround. Historically, the building was entered via Vine Street. A bottling works was operating at this location in 1951, with an attached one-story warehouse to the north of the main building. The north warehouse was removed by the 1980s and the area north of the bottling works was converted to paved parking. Following the removal of the north warehouse an additional entry was added to the north side of the building, facing Naylor Street. In a 2016 survey conducted by SWCA Environmental Consultants, Inc. for the Harris County Flood Control District, the former Bottling Works at 1120 Naylor Street was determined to be a contributing resource to the NRHP-eligible Houston Warehouse Historic District. It is not considered individually NRHP-eligible.

3.1.3 Houston METRO Warehouse

The METRO Warehouse at 1116 Naylor Street is comprised of adjoining building masses. The historic-age front portion of the building is a c. 1930 one-story or one-and-one-half-story rectangular-plan warehouse building facing east to Vine Street. Thick vegetation covers the entire east facade of the building. A large one-story addition, constructed between 1978 and 1989, extends westward from the rear of the original building. The rear addition is clad in metal, with large, fixed, metal-frame windows. A second-story metal-clad addition, also built in the late 1970s or 1980s, rises from the middle of the building. A paved parking area extends north to Naylor Street from the rear building extension, to form an L-shaped parcel. The property appears to be accessed through the driveway to Naylor Street. The building was used historically as a general supply store and a warehouse. In a 2016 survey conducted by SWCA Environmental Consultants, Inc. for the Harris County Flood Control District, the METRO Warehouse at 1116 Naylor Street was determined to be a contributing resource to the NRHP-eligible Houston Warehouse Historic District. It is not considered individually NRHP-eligible.

3.1.4 Carlisle Plastics Warehouses

The Carlisle Plastics Warehouses are located on the parcel now addressed as 1133 Providence Street in Houston, Texas. The parcel is bound by Jackson Street on the west, Naylor Street on the north, Walnut Street on the east, and a vacant, heavily vegetated parcel to the south. No portion of the parcel adjoins Providence Street. This property parcel contains two warehouse buildings, attached to one another. Until the mid-2010s the north building was addressed as 1110 Naylor Street and the south building was addressed as 1119 Naylor Street. In TxDOT's Section 106-related Historical Resources Survey Reports for the NHHIP, the north building was identified as the Carlisle Plastic North Warehouse or the "metal warehouse" and the south building was identified as the Carlisle Plastics South Warehouse or the "brick warehouse."

The Carlisle Plastics North Warehouse was constructed circa (c.)1940 and is one story in height. It is arranged in a roughly rectangular plan, with two side-gable primary rooflines and lower-height shed-roof extensions on the building's north and west sides. A narrow flat-roof addition extends along the east side of the building. The east addition is made of similar materials as the Carlisle Plastics South Warehouse. The building's roof and walls are clad in corrugated metal.

According to a 2016 survey conducted by SWCA Environmental Consultants, Inc. for the Harris County Flood Control District, the Carlisle Plastics South Warehouse was constructed in c.1940. However, based on historic aerials and visual appearance, the Carlisle Plastics South Warehouse was likely constructed in the 1950s. It is a rectangular-plan building with the exception of an irregular cutout on the southeast corner conforming to the former location of a railroad spur east of the building. The warehouse has a flat roof and brick-clad exterior walls. A map showing the location of the Carlisle Plastics Warehouses is in Attachment B (page B-2) and photographs are in Attachment C (pages C-1 through C-3).

Both warehouses were identified as contributing resources to the National Register of Historic Places (NRHP)-eligible Houston Warehouse Historic District, as delineated in the 2016 SWCA survey. The Houston Warehouse Historic District is eligible for the NRHP under Criterion A in the areas of Commerce and Industry and under Criterion C in the area of Architecture. Both warehouses, while modest and in deteriorating condition, reflect the form and materials typical of mid-twentieth-century warehouses and add to the district's historic character. These determinations of NRHP eligibility were confirmed in historic resources surveys conducted for the NHHIP in 2017 and 2018 and subsequent SHPO concurrence.



Photo 3-1. Carlisle Plastics (Metal) Building, facing east.

3.1.5 Readers Distributors Warehouse

The Readers Warehouse property is made up of three associated parcels, collectively addressed as 1201 Naylor Street in Houston, Texas. The Readers Warehouse building is a one-story, flat-roof, commercial/industrial building, constructed in 1954, that serves as office and warehouse space for a furniture and flooring materials distributor. The Readers Warehouse is distinguished for its irregular form and Moderne stylistic detailing along the building's curved southwest wall and entry area, unusual for a warehouse building of the period. The building was designed by the Houston architectural firm Irving Klein and Associates. A large addition was appended to the rear (north) side of the building in 1998. The addition is not easily visible from the public ROW and does not markedly detract from the significant features of the original building. A map showing the location of the warehouse is in Attachment B (page B-3) and photographs are shown in Attachment C (pages C-4 and C-5). As noted above, the Readers Warehouse is composed of three inter-related parcels, all sharing the same ownership:

- The 1954 portion of the Readers Warehouse building.
- The 1998 addition to the building's north side and concrete access driveways on the east and west sides of the building.
- Concrete access drives that function as an extension of Naylor Street between Vine Street and Walnut Street. These access drives are privately owned but are commonly used for public ingress and egress to adjacent streets and businesses.

In September 2006 the Readers Warehouse was determined to be a contributing resource to the NRHP-eligible Houston Warehouse Historic District in a historic resources survey conducted for environmental studies of the proposed Houston METRO Intermodal Terminal. The SHPO concurred with this determination on September 27, 2006. In a 2016 historic resources survey conducted by SWCA Environmental Consultants, Inc. for the Harris County Flood Control District, the Readers Warehouse was identified as individually eligible for the NRHP and also as a contributing resource to the Houston Warehouse Historic District. The Houston Warehouse Historic District is eligible for the

NRHP under *Criterion A* in the areas of Commerce and Industry and under *Criterion C* in the area of Architecture. These determinations of NRHP eligibility were confirmed in historic resources surveys conducted for the NHHIP in 2017 and 2018 and subsequent SHPO concurrence.



Photo 3-2. Readers Distributors Warehouse, Front (south) facade facing northeast.

3.1.6 Henke's Grocery

Henke's Grocery is contributing to the Houston Warehouse Historic District and is also individually eligible for listing in the NRHP. The resource is a rare, surviving example of a late nineteenth century commercial building with Italianate styling in the warehouse district of the Fifth Ward. The resource retains integrity of location and overall integrity of design, materials, and workmanship despite apparent modifications of original double-door openings and an addition, as well as some diminished integrity of setting, feeling, and association due to proximity to the I-10 highway alignment. It is still easily recognizable as a nineteenth century commercial building. See page C-6 for photographs of Henke's Grocery.

The property is a two-story building with a flat roof and polygon-shaped plan. It is located on a corner that exposes the north, west, and south elevations. The building is stucco clad masonry; however, the second story has stucco which is detailed to mimic large rectangular stone blocks. All of the details and trim on the building are of cast stone. A cornice with a cast stone design in a geometric pattern wraps around the north and west elevations. A double belt course separates the floors. The upper story of the north facade contains a row of six tall, narrow windows with segmental arched tops. The two-over-two wooden-frame sash windows each have connected cast stone hoods. The ground floor has a span of six windows with segmental arched, three-light transoms. The windows appear to be wood-frame double casement windows with stucco panels below. On the west elevation, the main entry is located on the ground floor facing Rothwell Street and contains a pair of wooden doors with plate glass inserts. Four windows span the lower facade and five windows span the upper facade. The windows on the west elevation are identical to those seen on the north elevation.

The area around Henke's Grocery was an industrial and working-class neighborhood in the late nineteenth and early twentieth centuries and is known today as the warehouse district. The warehouse

area developed along Buffalo Bayou between the 1880s and the 1920s in response to the overlap of major transportation routes: water transport by means of the bayou and railroad transport by the many rail lines. Rail transport expanded in the area after the turn-of-the-century making the area attractive for commercial development. This grocery business was strategically located adjacent to the large railroad centers that connected directly to Buffalo Bayou and had goods of every kind. Also, businessmen and travelers convened at this location to conduct business.

In a deed dated 1873, David J. and Eliza Wilson conveyed the property for \$300 to W. R. McKee. The McKees deeded the property to Henry Henke in 1880. The 1881 city directory mentions a Fifth Ward Branch of Henry Henke's grocery business. The primary business was headquartered in the Pillot Building on Courthouse Square in downtown Houston. Henke & Pillot was one of Houston's first grocery chains. From 1884 to 1885, the grocery was listed as Keller's Grocery. In 1887, George C. Davis and his wife, were listed in the building as wholesale and retail grocers at 20, 22, and 24 Liberty Road (5th Ward), corner of Walnut. They lived in the Fifth Ward Hotel next door. The Davis family also operated a saloon on the premises. The Davises operated the grocery and resided at the hotel until 1900. Typical of regional trends of the period, many business owners or operators lived above their businesses. In 1899, Milton W. Frank is listed as the owner with George Davis as manager of the grocery. In 1903, the grocery became a saloon, billiard hall, and restaurant, operated by Frederick R. Weathersby and Thomas R. Hamilton. The address at that time was listed as 1202 Liberty, corner. In 1920, Ricardo Dorantes opened a restaurant at the site. The old saloon was divided into the Square Deal Tailor Shop, operated by Louis Huff, an African American. In 1922, during Prohibition, John D. Arthur operated the restaurant, now billed as a restaurant and soft drink parlor. In 1923, the Oakdale Sausage Company, operated by John and Mary Ludtke, occupied the building. In 1925, Liberty Avenue changed names to North San Jacinto, and throughout the 1920s, during prohibition, several restaurants operated in the building. In the early 1930s, the North San Jacinto Café occupied the building. In 1935, North San Jacinto Street became known as Rothwell. Through 1980, the building was either vacant or occupied by a café. Today it is occupied by law offices.

3.1.7 Tony's Barber Shop

Tony's Barber Shop is a contributing resource to the Houston Warehouse Historic District and is also individually eligible for listing in the NRHP. It is a rare surviving nineteenth century example of a commercial building in this area of Houston, and it is adjacent to two other rare surviving examples of nineteenth century commercial architecture. See page C-6 for photographs of Tony's Barber Shop.

The building is located between Henke's Fifth Ward Grocery on the west and the former Fifth Ward Hotel building on the east. It appears to have been constructed specifically to fill the space between the two buildings. The property is a one-story masonry brick building with a flat roof. It has an extremely narrow front facade with a central entry. The doorway has a single wooden-framed door with a single light and is surrounded by wooden-framed side-lights and a transom. A decorative, sheet metal cornice and brick corbelling accents the facade. The stucco-clad facade may not be original.

Deed research shows that the building at 1204 Nance Street was owned by the operators of the Fifth Ward Hotel when it was constructed. The hotel owners likely constructed 1204 Nance to generate additional income and to provide travelers with services customarily found in or near hotels. By 1890, the Sanborn Map shows 1204 Nance Street as a narrow, one-story masonry building with a two-story frame addition at the rear. The rear addition is no longer extant. The ground floor of the hotel was also

continuously leased over the years to various merchants. For most of the first decades of the twentieth century the occupants of the site were not listed separately from the hotel in city directories. Anthony Dibello, a barber, first appears in the 1942 city directory as occupant of 1204 Nance. Dibello's business held the longest tenancy of the site and remained at this location until the late 1970s.

3.1.8 Fifth Ward Hotel

The Fifth Ward Hotel is considered a contributing resource to the Houston Warehouse Historic District due to its date of construction in the 1880s, but is not considered individually NRHP-eligible due to extensive modifications. See page C-6 for photographs of Fifth Ward Hotel. More information about this property is in Appendix D of the September 2019 Historic Resources Survey Report Update.

3.1.9 Gulf Coast Implement

Gulf Coast Implement is considered a contributing resource to the Houston Warehouse Historic District due to its date of construction in 1930, but is not considered individually NRHP-eligible. See page C-8 for a photograph of Gulf Coast Implement. More information about this property is in Appendix D of the September 2019 Historic Resources Survey Report Update.

3.1.10 Heflin Rubber Company

The Heflin Rubber Company is considered a contributing resource to the Houston Warehouse Historic District due to its date of construction in 1935, but is not considered individually NRHP-eligible. The building is in good condition and the loss of the property would impact the overall historic district; however, it is not a significant building in its own right. See page C-9 for a photograph of Heflin Rubber Company. More information about this property is in Appendix D of the September 2019 Historic Resources Survey Report Update.

3.1.11 Union Transfer and Storage Building

The Union Transfer and Storage Building is listed in the NRHP and is considered a contributing resource to the Houston Warehouse Historic District. Built in two phases in 1917 and 1920, a building rehabilitation project that began in 1998 created individual offices and basement storage space. The building is now called Vine Street Studios. The rehabilitation project followed the Secretary of the Interiors' Standards for Rehabilitation. See page C-9 for a photograph of Union Transfer and Storage Building. More information about this property is in Appendix D of the September 2019 Historic Resources Survey Report Update.

3.2 Near Northside Historic District

The Near Northside Historic District is located on the east side of I-45, just east and northeast of the multi-level I-45/I-10 interchange. The interchange is in the vicinity of the confluence of White Oak Bayou and Little White Oak Bayou, which adds to the complexity of the interchange. This District represents a typical late 19th and early 20th century working class neighborhood that developed in response to nearby industrial centers. It includes an intact collection of working-class homes dating to the District's period of significance (c.1890-1940) with very little postwar infill. The Near Northside Historic District is listed in the NRHP under Criteria A and C. Figure 3-1 shows the location and boundary of the Near Northside Historic District.

3.2.1 Residential Property at 109 Carl Street

The residential property at 109 Carl Street contains two built resources: a 1910 house that is a contributing resource to the Near Northside Historic District, and a garage that is a noncontributing resource to the historic district. The noncontributing garage is located at the northwest edge of the parcel and touches the existing ROW. The contributing house is located 24 feet from the existing ROW boundary and about 57 feet from the nearest I-45 pavement edge. The location of the property is shown in Figure 3-1 and Photo 3-3 below shows the noncontributing garage at the property.



Photo 3-3. View facing east, showing noncontributing garage at 109 Carl Street.

3.3 Cheek-Neal Coffee Company Building

The Cheek-Neal property is located at 2017 Preston Street, on the east side of US 59/I-69 just east of downtown Houston. It is made up of four lots and an additional tract that comprises the south-central and southeast portions of Block 168, bounded by Chartres Street on the west, Congress Street on the north, St. Emanuel Street on the east, and Preston Street on the south. The building takes up most of the parcel, with paved parking area on the west portion of the property. The remainder of the city block is also used as paved parking area. A map showing the location of the building and property is in Attachment B (page B-4) and photographs are shown in Attachment C (pages C-10 and C-11).

The main portion of the building is five stories in height, with a one-story extension on the building's northeast side. The concrete framing forms four bays on the north and south elevations and nine bays on the east and west elevations. The bays are defined by a regular grid of exposed, horizontal floor plates and vertical concrete columns with red brick infill. One large, steel, multi-light industrial-type window is in each bay on floors two through five on the west, south and east elevations. There are triplet grouped, one-over-one-light wood-sash windows on the ground floor of the south elevation. The ground floor of the east elevation has a mix of window sizes and overhead loading bays. The building features elements of the Arts and Crafts movement such as the diamond and triangular tiles set into shallow brick-framed rectangular panels below most of the window openings. The parapet is outlined with red brick and is divided into three bays with small gabled parapets flanking a large, flat, central parapet that historically served as a signboard. There are concrete loading docks on the east and west elevations. The building retains a high level of its architectural integrity.

The building was designed by Houston architects Joseph Finger and James Ruskin Bailey as a regional coffee processing facility for the developers of the Maxwell House brand, which accounted for one-

third of the U.S. coffee market by the 1920s. The company's Houston building was one of seven similar multi-story buildings across the country where the company roasted, blended, packaged, and shipped coffee nationwide. It was in use as a coffee processing facility from its 1917 construction until 1947. The Cheek-Neal Coffee Company Building is representative of Houston's rapid growth in the early twentieth century into an industrial and transport hub, which led to construction of numerous warehouses and shipping facilities around the periphery of downtown Houston. The Cheek-Neal property was listed in the NRHP on June 7, 2016 under Criterion A in the area of Industry at the local level of significance.



Photo 3-4. Cheek-Neal Coffee Company Building, Front (south) facade facing northeast.

3.4 *Rossonian Cleaners*

The Rossonian Cleaners property is located south of downtown Houston, immediately north and west of existing US 59/I-69 near the US 59/I-69 at SH 288 interchange. SH 288 enters the interchange from the south/southwest and US 59/I-69 enters from the west. US 59/I-69 and SH 288 merge together in a multi-level interchange that includes direct-connector ramps and collector/distributor ramps to and from nearby local streets. The merged freeway is designated as US 59/ I-69 at SH 288 north of the interchange to the downtown loop (at the interchange with existing I-45). A map showing the location of the building is in Attachment B (pages B-5 and B-6). and photographs are shown in Attachment C (pages C-12, C-13, and C-14).

The Rossonian Cleaners is located at 3921 Almeda Road, immediately north and west of existing US 59/I-69 near the US 59/I-69 at the SH 288 interchange. It is situated on a triangular-shaped 0.275-acre property parcel. The building takes up most of the parcel, with a small paved parking area at the south end of the property. The parking area contains a large-diameter tubular steel monopole, which supports an overhead billboard that extends over the Rossonian Cleaners.

The Rossonian Cleaners, originally established in 1920 at the Rossonian Hotel (no longer extant) in downtown Houston, moved to this building in 1928. The building is comprised of two distinct portions. The original 1928 portion, which makes up the north half of the building, features a polychrome brick exterior with cast-stone detailing including sign panels and prominent finials extending above the

parapet. A c.1940-1945 addition comprises the south half of the building. The addition, originally used for cold storage, has undergone notable exterior alterations but retains its overall form and fenestration. The Rossonian Cleaners has served as an anchor for the Almeda Road commercial strip and surrounding community. In a 2017 survey, TxDOT determined that the Rossonian Cleaners is eligible for the NRHP under Criterion A in the area for Commerce and under Criterion C in the area of Architecture, both at the local level of significance.



Photo 3-5. Rossonian Cleaners building (1928 portion); View facing east-northeast

3.5 Former Downtown Houston Post Office, Processing and Distribution Center

The Former Downtown Houston Post Office, Processing and Distribution Center is located on the east side of I-45, between Franklin Street on the south and railroad ROW on the north. The post office building occupies the north-central portion of the property, surrounded by large surface parking lots to the south and east and smaller paved surface parking areas to the north and west of the building. Existing I-45 at this location is carried on the Pierce Elevated structure about 27 feet above ground level. There are four travel lanes in each direction. The property was listed in the NRHP in 2018 under Criteria A and C. The location of the property is shown in Figure 3-1 and Photo 3-6 below shows the structure.



Photo 3-6. Former Downtown Houston Post Office, Processing and Distribution Center; View facing northeast

3.6 Parks and Bike Paths

The following sections discuss the parks and bike paths within Segment 3.

3.6.1 White Oak Park

White Oak Park is a 23-acre park on the north side of I-10 between Taylor Street and Houston Avenue. The park includes land on both sides of White Oak Bayou. The White Oak Bayou Greenway trail and other trails provide access through and to the park. The trail that approximately parallels the bayou is part of the White Oak Bayou Greenway trail, which extends from Cypress North Houston Road into the Houston Downtown area.

3.6.2 American Statesmanship Park

American Statesmanship Park is approximately 0.1 acre in size and is located near and west of I-45 and I-10, northwest of Downtown. The land was donated to Harris County in 2012 and is owned and managed by Harris County Precinct 2. The park, which is also known as “Mount Rush Hour”, consists of 18-foot tall sculptures of Stephen F. Austin, Sam Houston, Abraham Lincoln and George Washington. The park is open Monday through Sunday from 7 a.m. to 6 p.m.

3.6.3 Buffalo Bayou Park

Buffalo Bayou Park extends from Shepherd Drive to Sabine Street, between Allen Parkway and Memorial Drive. The 124-acre park offers 4.5 miles of asphalt biking and jogging trails along the bayou. Additional park features include the Jamail Skatepark, the Eleanor Tinsley Park and outdoor amphitheater, Steele Dog Park, Lost Lake Visitor Center, and the Houston Police Officer’s Memorial. Park activities include bicycling, canoeing, walking/jogging, skate boarding, and volleyball.

3.6.4 Baldwin Park

Baldwin Park, approximately 5 acres in size, is located in Midtown at the corner of Elgin Street and Chenevert Street. The park was acquired by the City of Houston in 1905. A stone fountain located in the center of the park was installed in 1912 in memory of Houston's founding matriarch, Charlotte Allen. The park has a 0.32-mile long crushed granite trail that circles the fountain, several hundred-year-old oak trees, picnic tables, chess tables, a soccer field, and playground.

3.6.5 Houston Academy for International Studies SPARK Park

The Houston Academy for International Studies SPARK Park is located on the west side of US 59/I-69 between Elgin Street and Holman Street. The school is part of the SPARK School Park Program, and the playground and park area are open to the public after school hours. Park features include a ball court, open grass area, and benches.

3.6.6 Peggy's Point Plaza Park

Peggy's Point Plaza Park, which is approximately a half-acre in size, is located at the corner of Richmond Avenue and Main Street, north of US 59/I-69. The park is fenced and includes several benches and a decorative fountain in the center of the park.

3.6.7 Peggy Park

Peggy Park, an approximately 9-acre triangular shaped park, is located south of SH 288 and US 59/I-69 between Almeda Road, Chenevert Street, and Cleburne Street. The park has a covered basketball pavilion, a playground, picnic tables, and benches.

3.6.8 James Bute Park

James Bute Park, consisting of 1.5 acres, is located in downtown Houston on the south bank of the Buffalo Bayou, between McKee Street and Elysian Street. The park is within the historic Frost Town settlement area and is managed by Harris County Precinct 2. Park features include picnic tables, benches, and an asphalt jogging trail.

3.6.9 Freed Art and Nature Park

Freed Art and Nature Park occupies approximately 6 acres of land on the west side of the I-45 and I-10 interchange at the corner of Houston Avenue and White Oak Boulevard. The park land was donated to the City of Houston in 2002 by the Frank and Eleanor Freed Foundation. The park is a heavily wooded area surrounded by paved trails that connect to the surrounding parks. Little White Oak Bayou is along east side of the park.

3.6.10 Hogg Park

Hogg Park, which is slightly more than 2 acres in size, is located on the east side of I-45 and the White Oak Bayou between Quitman Street and Hogan Street. The White Oak Bayou Greenway trail system connects to the park. The Leonel Castillo Community Center is located on the northeast side of the park, but not on park land. The community center is owned and managed by Harris County. A Houston B-Cycle bike share station is located at the park.

3.6.11 Linear Park

Linear Park, consisting of approximately 7 acres, is located along the south banks of the Buffalo Bayou on the west side of Downtown. The park has paved trails that connect to Buffalo Bayou Park and which are under the elevated portion of I-45 into downtown.

3.6.12 Sam Houston Park

Sam Houston Park was the first park established in the city of Houston in 1900. The park occupies approximately 20 acres on the west side of downtown Houston between I-45 and Bagby Street. Several buildings are in the park, including the Kellum-Noble House which is NRHP-listed and operates as a public museum. The park is fenced and gated, and a paved trail surrounds the perimeter of the park.

3.6.13 Tranquility Park

Tranquility Park was built to honor Houston's historic role in spaceflight and the Apollo 11 landing on the moon in July 1969. This urban park is approximately 4 acres in downtown Houston and includes benches, walkways, pools, and water fountains. Several local festivals, art shows, and events are held at the park including the Children's Festival and the Houston International Festival.

3.6.14 Emancipation Park

Emancipation Park is a historic 11-acre park in Houston's Third Ward. The park was originally built in 1872 to commemorate the Emancipation Proclamation and to provide a location to celebrate Juneteenth, a holiday commemorating the June 1865 announcement, in Texas, of the abolition of slavery. The park was purchased by the city of Houston in 1918. Renovations completed in 2017 include refurbished landscapes and playgrounds, renovation of the park's two historic buildings, a recreation center, full sized baseball field, tennis court, basketball court, large event/performance space, pool and pool house.

3.6.15 Discovery Green

Discovery Green is an approximate 12-acre park in Downtown Houston. The park was established via a public-private partnership between the City of Houston, the Houston First Corporation and Discovery Green Conservancy, the nonprofit 501(c)(3) organization that operates and maintains the park. It is bounded by La Branch Street to the west, McKinney Street to the north, Avenida de las Americas to the east, and Lamar Street to the south. Park features include a lake, playground, 2 dog runs, venues for public performances, and numerous recreational lawns.

3.6.16 Guadalupe Plaza Park

Guadalupe Plaza Park is located on the east side of US59/I-69 in the Second Ward of Houston. The park occupies approximately 7 acres. The park was originally built as a performance venue in the 1980s. The park began to decline for several years and was largely occupied by homeless people. In 2012, the city of Houston was awarded a federal grant to renovate the park. The park reopened in July 2016, and renovations include a splash pad and fountain area, a promenade, performing arts area, and canoe access connecting to Buffalo Bayou. The park is available for public and private events.

3.6.17 Swiney Park

Swiney Park, approximately 2 acres in size, is a sparsely wooded park located on the east side of US 59/I-69 between Gillespie Street and Cline Street. The park includes a 1-mile long paved trail, playground equipment, picnic benches, covered pavilion with basketball courts, and the Swiney Community Center.

3.6.18 Hennessy Park

Hennessy Park, which consists of approximately 1.5 acres, is located north of I-10 between Maury Street and a railroad. The park has a 0.20-mile long paved pathway around the perimeter of the park, a baseball field, a swing set, benches, and a covered pavilion with a basketball court.

3.6.19 Allen's Landing Memorial Park

Allen's Landing Memorial Park, which is slightly less than 2 acres, is the site where Augustus C. Allen and John K. Allen first arrived in 1836 and founded the city of Houston. The park is located at the confluence of Buffalo and White Oak Bayous, which was the first port of Houston. It is located on the south banks of Buffalo Bayou between Main Street and Fannin Street. Park amenities include a dock, promenade area, and walkways along the bayou. Park activities include kayaking, canoeing, and walking.

3.6.20 Confederate Ship Area Park

The Confederate Ship Area is a small greenspace (less than 1 acre) along the south banks of Buffalo Bayou in Downtown that marks the site of a sunken confederate ship. The park is located at the intersection of Commerce Street and Travis Street near Allen's Landing Park. The park stairs lead to pathways along the bayou.

3.6.21 Goyen Park

Goyen Park, which consist of approximately 2 acres, is located directly south of the University of Houston Downtown campus, between Milam Street and Main Street. The park is sparsely wooded and includes a garden area maintained by the university. The Houston Parks and Recreation Department and the University of Houston Downtown have partnered to restore urban habitat for migratory birds along Buffalo Bayou within the park area.

3.6.22 Brewster Park

Brewster Park, a 6-acre park, is located north of the Southern Pacific Railroad on the east side of US 59/I-69. The park includes a playground, covered basketball pavilion, benches, and tables.

3.6.23 Sesquicentennial Park

Sesquicentennial Park was established in 1986 to commemorate the 150th anniversary of the founding of Houston. The park occupies approximately 8 acres along the banks of Buffalo Bayou in the downtown Houston theater district. Park features include the Allen H. Carruth Promenade, the Baker Common area, artwork and historic photographic display, gardens, paved trails, and a boat launch.

3.6.24 Bikeways and Open Space Along Bayous are Not Protected by Section 4(f)

The regulations regarding Section 4(f) define a Section 4(f) property as “publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance.” 23 CFR Section 774.14. FHWA interprets this definition as follows:

Publicly owned land is considered to be a park, recreation area or wildlife and waterfowl refuge *when the land has been officially designated as such* by a Federal, State or local agency, and the officials with jurisdiction over the land determine that its primary purpose is as a park, recreation area, or refuge. *Primary purpose is related to a property's primary function and how it is intended to be managed. Incidental, secondary, occasional or dispersed activities similar to park, recreational or refuge activities do not constitute a primary purpose within the context of Section 4(f).*

FHWA Section 4(f) Policy Paper (July 20, 2012) (emphasis added). While used by the public for recreational activities, the bikeways and open spaces located along the bayous are not protected by Section 4(f) because these properties are not officially designated for recreational use.

Bikeways

The bikeways affected by NHHIP are excepted from Section 4(f) requirements because the bikeways are part of the local transportation system and function primarily for transportation. 23 CFR Section 774.13(f)(4). FHWA has stated that, “[i]f the publicly owned facility is primarily used for transportation and is an integral part of the local transportation system, the requirements of Section 4(f) would not apply since it is not a recreational area.” FHWA Section 4(f) Policy Paper (July 20, 2012). As explained below, beginning in the 1990’s the City of Houston (“City”) has developed several bikeways that are transportation facilities that connect the urban core of the city to transit stops and neighborhoods, and that run along the bayous. The City obtained the permission of the local flood control district to develop bikeways on property dedicated to flood control, and expressly agreed that the bikeways would not be a “park.” The City obtained from TxDOT the federal transportation funds needed to develop the bikeways. The City also obtained federal transportation funds directly from the Federal Highway Administration (“FHWA”).

The Texas Legislature created the Harris County Flood Control District (“District”) in 1937 for the purpose of controlling, storing, preserving and distributing storm and flood waters within Harris County. Act of May 15, 1937, 45th Leg., R.S., ch. 360, 1937 Tex. Gen. Laws 714. In addition to this main objective, the legislature delegated to the District the powers to:

acquire land and rights and interests therein and any other character of property needed to carry on the work of flood control, by gift, devise, purchase, or condemnation;

devise plans and construction works to lessen and control floods; to reclaim lands in the District; to prevent the deposit of silt in navigable streams; to remove obstructions, natural or artificial, from streams and water courses; to regulate the flow of surface and flood waters; and to provide drainage where essential to the flood control project[.]

Act of May 15, 1937, 1937 Tex. Gen. Laws at 714.

Through an interlocal agreement between the City and District, the City obtained authorization to construct the bikeways on the District's property. The agreement recognized that the property is owned and managed by the District expressly for the paramount public purpose of flood control. The agreement did not convey to the City a fee interest or easement, and it declared that the bikeways are not a "park." Articles VII and IX, Agreement of December 31, 1997 between the City of Houston and Harris County Flood Control District.

The City and District entered a second interlocal agreement that repealed the first agreement. The second agreement added provisions on the City's obligations to construct and maintain the bikeways, but otherwise continued the main provisions of the first agreement. The second agreement states:

The District has advised COH and COH is aware that the Property was acquired for flood control and drainage purposes...The District hereby expressly reserves to itself, its officers, employees, agents, and contractors, the right to enter upon said Property and Trail at any time for any purpose necessary or convenient in connection with drainage and flood control work, to flood said Property and Trail, and to make such other use of said Property and Trail as may be necessary or desirable in connection with drainage and flood control, and COH shall have no claim for damages of any character on account thereof against the District...(Article XI, Agreement of October 23, 2018, between the City of Houston and Harris County Flood Control District.)

The second interlocal agreement (again) provides the bikeways are not a "park:"

COH's use of the Property set out herein is intended by the Parties to be temporary in nature. Neither the District nor the City intend to designate any part of the Trail as a park, recreation area, scientific area, wildlife refuge, or historic site for any purpose, including for the purpose of TEX. PARKS & WILD. CODE ANN. Ch. 26, as amended, or to dedicate any part of the Trail as a park for any purpose, including for the purpose of TEX. LOC. GOV'T CODE ANN. Ch. 317, as amended. (Article XVI, Agreement of October 23, 2018 between the City of Houston and Harris County Flood Control District.)

Once the City had the authority to use the District's land, the City applied for, and obtained, federal transportation funds to develop the bikeways as transportation facilities. Each time, the City agreed to contribute the matching 20 percent local funds, and to construct and operate the transportation facility.

In Segment 2, the Preferred Alternative will have impacts to:

- bikeway along Little White Oak Bayou (IH 610 Loop to Cavalcade Street)

For the bikeway on Little White Oak Bayou, TxDOT and the City entered into a funding agreement. On October 23, 2002, TxDOT granted \$912,000 of federal funds for a transportation enhancement project under (then in effect) 23 U.S.C. Section 133(d)(2), and 43 T.A.C. ch. 11, subch. E. Federal law reserved roughly ten percent of the surface transportation funds apportioned to a state to "transportation enhancements" – projects that have a relationship to the surface transportation system, yet go beyond activities customarily incorporated into transportation projects.

In Segment 3, the Preferred Alternative will have impacts to:

- bikeway along White Oak Bayou (Houston Avenue to Main Street)
- bikeway along Buffalo Bayou (Sesquicentennial Park to Main Street)
- bikeway along Buffalo Bayou (Main Street to Lockwood Drive)

Part of the bikeway along White Oak Bayou (Hogan Street to Main Street) is on the right of way of the old MKT Rail Line that TxDOT purchased from the Missouri Pacific Railroad on December 29, 1992. The City purchased the rail bridges on the line from Union Pacific Railroad (successor in interest to Missouri Pacific Railroad) on July 31, 1998, for use in the City's bikeway program. TxDOT sold (exchanged for cash and for a City-owned parcel needed for a TxDOT project) the rail right of way to the City on December 3, 2007.

For the bikeway on White Oak Bayou, TxDOT and the City entered into two funding agreements:

- On May 23, 2002, TxDOT granted \$3.6 million of federal funds for a transportation enhancement project.
- On July 23, 2010, TxDOT granted \$3.2 million of federal funds for a congestion mitigation and air quality ("CMAQ") improvement project under 23 U.S.C. Section 149 and 43 T.A.C. Section 16.153(a)(5). Federal law specifies that CMAQ funds are for transportation projects that will have air quality benefits, to be used in air non-attainment areas (such as the Houston area).

For the bikeway on Buffalo Bayou, there are several funding agreements:

- (Sesquicentennial Park to Main Street), on February 23, 2001, TxDOT granted \$1.2 million of federal funds for a transportation enhancement project.
- (Main Street to Lockwood Drive), on February 9, 1996, TxDOT granted \$3.9 million of federal funds for a CMAQ project.
- (Main Street to McKee Street), on October 21, 2010, TxDOT granted \$1.7 million of federal funds for a CMAQ project.
- (US 59 to East Drive), on January 27, 2017, TxDOT granted \$2.4 million of federal funds for a "transportation alternatives project" under 23 U.S.C. Section 133(h) – projects that have a relationship to the surface transportation system, yet go beyond activities customarily incorporated into transportation projects.

The City applied directly to FHWA for a grant under the Transportation Investment Generating Economic Recovery ("Tiger") program. FHWA approved a grant of \$15 million for the City's "Houston Regional Bike/Ped Connections to Transit" program, which included improvements to the bikeways on White Oak Bayou and Buffalo Bayou. The agreement was funding by the FY 2012 Tiger Discretionary Grants. Consolidated and Further Continuing Appropriations Act, 2012 (Pub.L. 112-055, Nov. 18, 2011). Funding Agreement of March 13, 2013 between the City of Houston and the Federal Highway Administration.

The transportation purpose of the bikeways was not changed by subsequent actions of the City to raise additional funds and to manage the development of the bikeways. On November 6, 2012, the voters of the City approved a parks bond proposition of which \$100 million was designated to support "Bayou Greenways 2020." After the proposition passed, the City entered into two agreements with the Houston Parks Board, Inc., a nonprofit local government corporation, for purposes of tasking the Parks Board with developing parks and maintaining them. The agreement also focused on "greenways," the

construction of bikeways and amenities such as landscaping and benches along the bayous. The agreements do not have any provision that deems the bikeways identified above are “parks.” Both agreements have a map attached as Exhibit A. While the map identifies certain “parks,” none of the bikeways identified above are labeled as such. Rather, it identifies areas along the bayous as “greenways.” See, Interlocal Agreement for Bayou Greenways 2020, signed July 3, 2013; Bayou Greenways 2020 Economic Development Agreement, signed October 24, 2013. The Harris County Flood Control District, the owner of the property along the bayous, is not a party to the agreements, and so there is no change to the designation (first established in the 1997 agreement between the District and the City, discussed above) that the bikeways are not “parks.”

While the bikeways along the bayous are not Section 4(f) resources, “it is FHWA's policy that every reasonable effort should be made to maintain the continuity of existing and designated shared use paths and similar facilities.” FHWA Section 4(f) Policy Paper (July 20, 2012). Per FHWA policy, TxDOT has taken reasonable measures to maintain the connectivity of these bike paths. While impacts on some resources are likely unavoidable, TxDOT will implement the following measures to mitigate these impacts:

- TxDOT will accommodate or replace existing bikeways.
- Trails that would be temporarily or permanently affected will be replaced or relocated. During construction, TxDOT will either maintain existing trail access or provide detour routes.
- The proposed trail opening at the Little White Oak Bayou crossing of I-45 south of North Street provides an opportunity for a trail to connect Woodland Park and Moody Park, which does not exist today.
- TxDOT will propose trail openings conducive to bicycle and pedestrian crossings at Little White Oak Bayou under I-45 just north of Patton Street and at Little White Oak Bayou under I-610, subject to regulation by the District.
- During detailed design, TxDOT will coordinate with entities who desire to develop trails and connections in the proposed project area and will accommodate plans by others, if feasible.

Open Space

While “open space” may be considered a Section 4(f) resource if the primary purpose of the property is for recreation, the open areas along the bayou “greenways” in the project area do not qualify as such. As reflected in the legislation creating the District, and confirmed in the interlocal agreements between the District and the City, the primary use of the property along the bayous is for drainage and flood control. While individuals may use these properties for recreation, this use is secondary and incidental and does not subject these areas to Section 4(f) protection. Even so, efforts have been made to maintain existing open space and proposed detention areas are being evaluated as potential open spaces. TxDOT will coordinate with local groups and agencies to accommodate enhancements to standard landscaping and recreational use of open space in and around storm water detention areas, where feasible. Additionally, TxDOT is working with the City to identify highway cap areas that would serve to create even more open space and to ensure that safe bicycle and pedestrian access across adjacent streets is incorporated into the final design.

4 IMPACTS TO SECTION 4(F) PROPERTIES

This section describes whether and how each Build Alternative (the Reasonable Alternatives) will result in a direct or constructive use of the Section 4(f) resources located within the study area of Segment 3.

If it is determined that a Build Alternative will result in a direct or constructive use of the Section 4(f) resource, this section will describe any resulting environmental impacts. THC concurrence with the effect determinations (TxDOT 2020) is in Attachment F and also in the Section 106 PA for this project.

4.1 Houston Warehouse Historic District

This section describes the impacts of the proposed action (Alternative 11) and the three Reasonable Alternatives to the Houston Warehouse Historic District. Attachment D contains a matrix that summarizes the analysis of potential impacts to the Houston Warehouse Historic District and 4(f) resources within it.

Proposed Action – Segment 3/Alternative 11

The proposed action was developed following the secondary screening phase, as a modification to Segment 3/Alternative 11 (see below for further information regarding the original Alternative 11). As initially proposed, Alternative 11 would shift the I-45 alignment to parallel I-10 and US 59/I-69, along the existing I-10 alignment on the north side of downtown Houston and along the US 59/I-69 alignment on the east side of downtown Houston. In the vicinity of the Houston Warehouse Historic District (between the existing I-45/I-10 interchange and McKee Street), the proposed action modifies Alternative 11 by shifting I-45/I-10 to an alignment several hundred feet north of existing I-10. Alternative 11 is unchanged in the remainder of NHHIP Segment 3.

The realignment of I-45/I-10 would result in acquisition of 5.1 acres of ROW from properties in the Houston Warehouse Historic District, representing about 12.5 percent of the historic district's total area. The NHHIP would result in the use of five of the district's contributing resources. Impacts to three contributing resources would be *de minimis*, and impacts to two contributing resources would be adverse (see Sections 4.1.1 and 4.1.2). In addition, NHHIP results in a use to the warehouse district itself, caused by the adverse impacts to two contributing properties.



Figure 4-1: Houston Warehouse Historic District

The NHHIP would acquire ROW from three parcels containing contributing resources:

- San Jacinto Warehouse (1125 Providence Street) – Contributing resource to the NRHP-eligible Houston Warehouse Historic District. The proposed action would acquire 88.23 square feet of land from the property (about 0.01 percent of the parcel’s area) from a paved parking area at the northeast edge of the property. TxDOT determined that the proposed action would have no adverse effect to the San Jacinto Warehouse property. TxDOT has prepared a determination of *de minimis* impact to this property.
- Former Bottling Works (1120 Naylor Street) – Contributing resource to the NRHP-eligible Houston Warehouse Historic District. The proposed action would acquire 0.07 acre of land from the property (about 27.62 percent of the parcel’s area) from a parking area north of the Bottling Works building. TxDOT determined that the proposed action would have no adverse effect to the Bottling Works property. TxDOT has prepared a determination of *de minimis* impact to this property.
- METRO Warehouse (1116 Naylor Street) – Contributing resource to the NRHP-eligible Houston Warehouse Historic District. The proposed action would acquire a small strip of land (0.024 acre) at the northeast edge of a paved parking area along Naylor Street. TxDOT determined that the proposed action would have no adverse effect to the METRO Warehouse property. TxDOT has prepared a determination of *de minimis* impact to this property.

Indirect effects related to proximity, noise, and visual impacts would be sharply reduced in the south portion of the historic district, as the existing I-10 freeway would be removed and realigned. However, indirect effects would markedly increase in the north part of the district through the I-45/I-10 realignment, with increase noise and elevated structures up to 65 feet in height.

Through Section 106 coordination, TxDOT determined that the proposed action would have an adverse effect to the Houston Warehouse Historic District.

Segment 3/Alternative 10

Segment 3/Alternative 10 would widen I-45 on its current alignment. Existing I-10 main lanes would remain on existing alignment with construction of an additional elevated structure for I-10 express lanes. Alternative 10 would incorporate approximately 0.50-acre of land from the 40.7-acre historic district into transportation use, resulting in the use of two contributing resources to the historic district:

- Union Transfer Company Warehouse (1113 Vine Street) (also known as the Union Transfer and Storage Building) – NRHP-listed, contributing to NRHP-eligible Houston Warehouse Historic District. Based on 2013 proposed ROW layouts, the use to this property under this alternative may be limited to acquiring a paved parking area with no direct impacts to the building.
- San Jacinto Warehouse (1125 Providence Street) – Contributing to NRHP-eligible Houston Warehouse Historic District. Segment 3/Alternative 10 would result in removal of portions of the San Jacinto Warehouse building.

Existing I-10 ROW would remain as a physical and visual division between the two discontinuous portions of the historic district. Based on the impacts noted above, this alternative would have a greater than *de minimis* impact to the historic district and would require preparation of an individual Section 4(f) Evaluation.

Segment 3/original Alternative 11

As originally developed, Segment 3/Alternative 11 would realign I-45 along the existing I-10 alignment. The existing I-10 ROW would be widened to accommodate the additional I-45 main lanes, as well as I-45 and I-10 express lanes. Original Alternative 11 would incorporate approximately 2.21 acres of land from the 40.7-acre historic district into transportation use, resulting in the use of six contributing resources to the historic district:

- Union Transfer Company Warehouse (1113 Vine Street) – NRHP-listed, contributing to NRHP-eligible Houston Warehouse Historic District. Segment 3/original Alternative 11 would result in demolition of the warehouse building.
- San Jacinto Warehouse (1125 Providence Street) – Contributing to NRHP-eligible Houston Warehouse Historic District. Segment 3/original Alternative 11 would result in removal of portions of the San Jacinto Warehouse building.
- Gulf Coast Implement Company (1021 North San Jacinto Street) – Contributing to NRHP-eligible Houston Warehouse Historic District. Segment 3/original Alternative 11 would result in demolition of the building.
- Henke's Fifth Ward Grocery (1200 Nance Street) – Contributing to NRHP-eligible Houston Warehouse Historic District. Segment 3/original Alternative 11 would result in demolition of the warehouse building.

- Tony's Barber Shop (1204 Nance Street) – Contributing to NRHP-eligible Houston Warehouse Historic District. Segment 3/original Alternative 11 would result in demolition of the warehouse building.
- Fifth Ward Hotel (1206 Nance Street) – Contributing to NRHP-eligible Houston Warehouse Historic District. Segment 3/original Alternative 11 would result in demolition of the warehouse building.

Existing I-10 ROW would remain as a physical and visual division between the two discontinuous portions of the historic district. Based on the impacts noted above, this alternative would have a greater than *de minimis* impact to the historic district and would require preparation of an individual Section 4(f) Evaluation.

Segment 3/Alternative 12

Segment 3/Alternative 12 would convert the downtown loop into a partial one-way loop by realigning I-45 northbound lanes along the existing US 59/I-69 alignment and maintaining two-directional flow on existing I-10 and US 59/I-69. Alternative 12 would incorporate approximately 0.494-acre of land from the 40.7-acre historic district into transportation use, resulting in the use of three contributing resources to the historic district:

- San Jacinto Warehouse (1125 Providence Street) – Contributing to NRHP-eligible Houston Warehouse Historic District. Segment 3/Alternative 12 would result in removal of portions of the San Jacinto Warehouse building.
- Gulf Coast Implement Company (1021 North San Jacinto Street) – Contributing to NRHP-eligible Houston Warehouse Historic District. Segment 3/Alternative 12 would result in demolition of the building.
- Union Transfer Company Warehouse (1113 Vine Street) – NRHP-listed, contributing to NRHP-eligible Houston Warehouse Historic District. Based on 2013 proposed ROW layouts, the use to this property under this alternative may be limited to acquiring of a paved parking area with no direct impacts to the building.

Based on the impacts noted above, this alternative would have a greater than *de minimis* impacts to two contributing resources in the NRHP-eligible warehouse district, and to the Houston Warehouse Historic District and would require preparation of an individual Section 4(f) Evaluation. It would also require a *de minimis* impact determination for the Union Transfer Company Warehouse property.

Existing I-10 ROW would remain as a physical and visual division between the two discontinuous portions of the historic district.

4.1.1 San Jacinto Warehouse

This section summarizes the impacts of the proposed action and the three Reasonable Alternatives to San Jacinto Warehouse.

Proposed Action – Segment 3/Alternative 11

Use of 88.23 square feet (0.01% of parcel). *De minimis* impact.

Segment 3/Alternative 10

Demolition of portions of building.

Segment 3/original Alternative 11
Demolition of portions of building.

Segment 3/Alternative 12
Demolition of portions of building.

4.1.2 Former Bottling Works

This section summarizes the impacts of the proposed action and the three Reasonable Alternatives to former Bottling Works.

Proposed Action – Segment 3/Alternative 11
Use of 0.07 acre of land from a parking area. *De minimis* impact.

Segment 3/Alternative 10
No use; no impact.

Segment 3/original Alternative 11
No use; no impact.

Segment 3/Alternative 12
No use; no impact.

4.1.3 Houston METRO Warehouse

This section summarizes the impacts of the proposed action and the three Reasonable Alternatives to Houston METRO Warehouse.

Proposed Action – Segment 3/Alternative 11
Use of 0.024 acre of land at edge of parking area. *De minimis* impact.

Segment 3/Alternative 10
No use; no impact.

Segment 3/original Alternative 11
No use; no impact.

Segment 3/Alternative 12
No use; no impact.

4.1.4 Carlisle Plastics Warehouses

This section describes the impacts of the proposed action and the three Reasonable Alternatives to the Carlisle Plastics Warehouses.

Proposed Action – Segment 3/Alternative 11
The proposed action would acquire 0.16-acre of land from the 1133 Providence Street property parcel, or about 15.91 percent of the parcel's total area. The ROW acquisition would require demolition of the Carlisle Plastics North Warehouse. Current plans call for retaining the Carlisle Warehouse South Warehouse in place. The existing I-10 ROW is located 578 feet south of the Carlisle Plastics South Warehouse. With the NHHIP, the Carlisle Plastics South Warehouse would be located 105 feet from the closest I-45/I-10 ROW, 109 feet from the closest edge of the elevated freeway structure, and

111 feet from the closest pavement edge, which is an exit ramp from eastbound I-10 to the eastbound frontage road. The height of the elevated structure at this location is approximately 42 feet.

Through Section 106 coordination, TxDOT determined that the proposed action would have an adverse effect to the Carlisle Plastics North Warehouse and no adverse effect to the Carlisle Plastics South Warehouse.



Photo 4-1. From Carlisle Plastics (metal) building, facing north to area of proposed ROW. Readers Distributors Warehouse (in photo forefront) would also be demolished.

Segment 3/Alternative 10

Segment 3/Alternative 10 would widen I-45 on its current alignment. Existing I-10 main lanes would remain on existing alignment with construction of an additional elevated structure for I-10 express lanes. Alternative 10 would avoid use of land from the Carlisle Plastics Warehouse property parcel. The Carlisle Plastics South Warehouse would be located approximately 200 feet north of the closest I-10 ROW. The Carlisle Plastics North Warehouse would be located approximately 325 feet north of the closest I-10 ROW.

Segment 3/original Alternative 11

As originally developed, Segment 3/Alternative 11 would realign I-45 along the existing I-10 alignment. The existing I-10 ROW would be widened to accommodate the additional I-45 main lanes, as well as I-45 and I-10 express lanes. Original Alternative 11 would avoid use of land from the Carlisle Plastics Warehouse property parcel. The Carlisle Plastics South Warehouse would be located approximately 125 feet north of the closest I-10 ROW. The Carlisle Plastics North Warehouse would be located approximately 250 feet north of the closest I-10 ROW.

Segment 3/Alternative 12

Segment 3/Alternative 12 would convert the downtown loop into a partial one-way loop by realigning I-45 northbound lanes along the existing US 59/I-69 alignment and maintaining two-directional flow on existing I-10 and US 59/I-69. Alternative 12 would avoid use of land from the Carlisle Plastics Warehouse property parcel. The Carlisle Plastics South Warehouse would be located approximately 220 feet north of the closest I-10 ROW. The Carlisle Plastics North Warehouse would be located approximately 345 feet north of the closest I-10 ROW.

4.1.5 Readers Distributors Warehouse

This section describes the impacts of the proposed action and the three Reasonable Alternatives to the Readers Distributors Warehouse.

Proposed Action – Segment 3/Alternative 11

With the proposed action, the I-45/I-10 main lanes would pass directly over the existing Readers Warehouse as shown in Figure 4-5. The entire property parcel would be acquired for additional ROW and the warehouse building would be demolished. Through Section 106 coordination, TxDOT determined that the proposed action would have an adverse effect to the Readers Warehouse.

Segment 3/Alternative 10

Segment 3/Alternative 10 would widen I-45 on its current alignment. Existing I-10 main lanes would remain on existing alignment with construction of an additional elevated structure for I-10 express lanes. Alternative 10 would avoid use of land from the Readers Warehouse property parcel. The Readers Warehouse would be located approximately 510 feet north of the closest I-10 ROW.



Figure 4-4: Digital rendering of the proposed new elevated roadway of the Proposed Action looking north where Readers Distributors Warehouse currently sits.

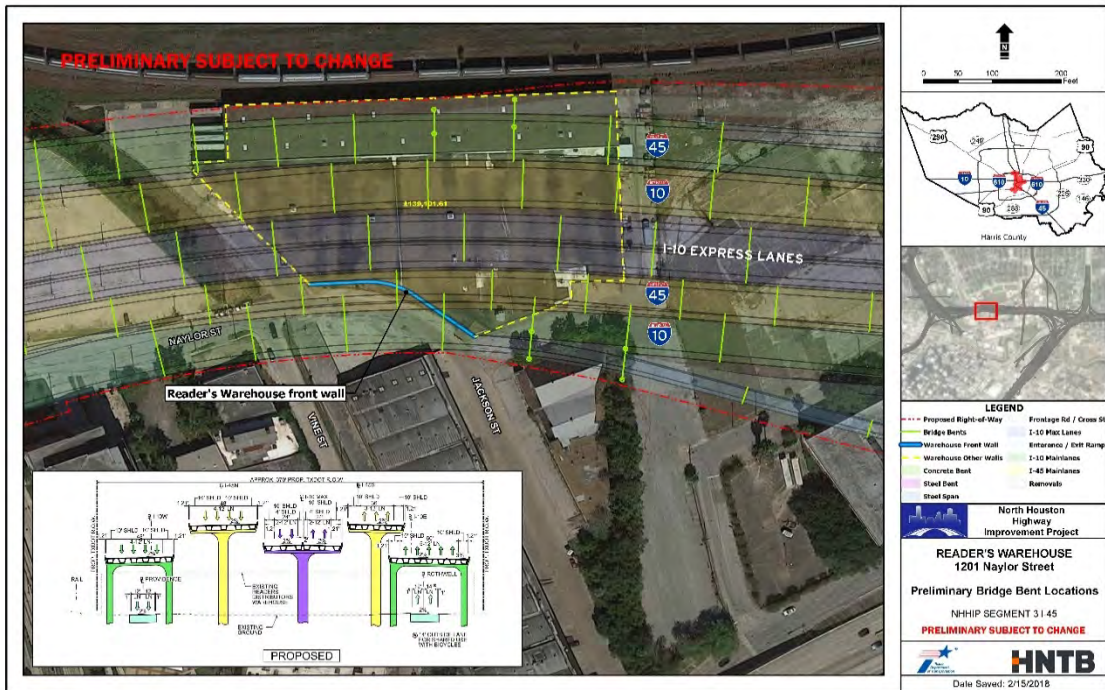


Figure 4-5: Preliminary design schematic exhibit showing Readers Distributors Warehouse building in relation to the Proposed Action.

Segment 3/original Alternative 11

As originally developed, Segment 3/Alternative 11 would realign I-45 along the existing I-10 alignment. The existing I-10 ROW would be widened to accommodate the additional I-45 main lanes, as well as I-45 and I-10 express lanes. Original Alternative 11 would avoid use of land from the Readers Warehouse property parcel. The Readers Distributors Warehouse would be located approximately 450 feet north of the closest I-10 ROW.

Segment 3/original Alternative 12

Segment 3/Alternative 12 would convert the downtown loop into a partial one-way loop by realigning I-45 northbound lanes along the existing I-69 alignment and maintaining two-directional flow on existing I-10 and I-69. Alternative 12 would avoid use of land from the Readers Warehouse property parcel. The Readers Warehouse would be located approximately 500 feet north of the closest I-10 ROW.

4.1.6 Henke's Grocery

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Henke's Grocery.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

The building would be demolished.

Segment 3/Alternative 12

No use; no impact.

4.1.7 Tony's Barber Shop

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Tony's Barber Shop.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/Original Alternative 11

The building would be demolished.

Segment 3/Alternative 12

No use; no impact

4.1.8 Fifth Ward Hotel

This section describes the impacts of the proposed action and the three Reasonable Alternatives to the Fifth Ward Hotel.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

The building would be demolished.

Segment 3/Alternative 12

No use; no impact.

4.1.9 Gulf Coast Implement

This section describes the impacts of the proposed action and the three Reasonable Alternatives to the Gulf Coast Implement.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

The building would be demolished.

Segment 3/Alternative 12

The building would be demolished.

4.1.10 Heflin Rubber Company

This section describes the impacts of the proposed action and the three Reasonable Alternatives to the Heflin Rubber Company.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.1.11 Union Transfer and Storage Building

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Union Transfer and Storage Building.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

Use of paved parking area.

Segment 3/original Alternative 11

The building would be demolished.

Segment 3/Alternative 12

Use of paved parking area.

4.2 Near Northside Historic District

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Near Northside Historic District.

Proposed Action – Segment 3/Alternative 11

The Near Northside Historic District is about 70.5 acres in size. Existing I-45 ROW makes up about 2.09 acres of the historic district. The proposed NHHIP work would require acquisition of approximately 0.01 acre of additional ROW from a property parcel at 109 Carl Street, or about 0.03 percent of the total historic district area. A noncontributing garage at 109 Carl Street would be removed for the project. A portion of the noncontributing garage already extends into the existing I-45 ROW. The contributing house on the same parcel would remain in place. The NHHIP would not result in the use of any of the district's contributing resources and the impact to the Near Northside Historic District would be *de minimis* and no mitigation is proposed.

- Residential property at 109 Carl Street (contributing resource) – The proposed project would acquire 437.22 square feet (about 0.01 acre) of additional ROW from this parcel. The additional ROW represents 8.17 percent of the total parcel size. Effects from the proposed project would consist of taking of a garage, a noncontributing secondary building, and a small percentage of the overall property. A portion of the noncontributing garage already extends into the existing I-45 ROW. The contributing house on the same parcel would remain in place. The NHHIP would not result in the use of any of the district's contributing resources; the impact would be *de minimis* and no mitigation is proposed.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.3 Cheek-Neal Coffee Company Building

This section describes the impacts of the proposed action and the three Reasonable Alternatives to the Cheek-Neal Coffee Company property.

Proposed Action – Segment 3/Alternative 11

The proposed action was developed following the secondary screening phase, as a modification to Segment 3/Alternative 11 (see below for further information regarding the original Alternative 11). Alternative 11 would shift the I-45 alignment to parallel I-10 and US 59/I-69, along the existing I-10 alignment on the north side of downtown Houston and along the US 59/I-69 alignment on the east side of downtown Houston. As originally proposed, I-45 and US 59/I-69 on the east side of downtown Houston would remain elevated facilities. This original alternative concept was modified to depress I-45 and US 59/I-69 below grade, with a highway cap over much of the length of the depressed section of freeway.

Proposed I-45 and US 59/I-69 would be in a depressed configuration in this location, with 10 southbound travel lanes and 11 northbound travel lanes. To accommodate the additional freeway width, a 150-foot-wide strip of additional ROW would be acquired on the east side of existing US 59/I-69, for a total ROW width of 375 feet. The additional ROW acquisition includes about 27.5 percent of the Cheek-Neal property parcel. Proposed I-45 and US 59/I-69 would move much closer to the Cheek-Neal building face, to a point about 16 feet from the one-story building extension.

Visually, the Cheek-Neal building would benefit from the NHHIP through removal of the elevated freeway structures and replacement with a depressed facility. Existing traffic noise on the building exterior is 71 dB(A) (hourly A-weighted sound level in decibels), which is projected to decrease to 70 dB(A) after completion of the proposed NHHIP. Based on the window type and placement, interior noise is assumed to be 20 dB(A) lower than exterior levels, or 50 dB(A) after NHHIP work. This interior noise level is 2 dB(A) below the minimum level for noise abatement and mitigation.

The potential indirect effect to the Cheek-Neal property is from soil movement and vibratory impacts to the Cheek-Neal building associated with construction of the depressed freeway facility. TxDOT engineering consultants HNTB, Inc. conducted an impact avoidance analysis, dated April 5, 2018, to study structural and vibratory impacts to the Cheek-Neal building.

First, structural layouts were adjusted to maximize the distance between the building face and the proposed drilled-shaft retaining wall on the east side of the depressed I-45/US 59/I-69 facility. The face of the retaining wall would be 25 feet from the building face and the drilled shafts would be 16 feet from the assumed building foundation. It should be noted that the structural foundation of the Cheek-Neal main building and extension are not definitively known and may require additional investigation prior to construction. If the Cheek-Neal building uses a deep foundation, there would be negligible effects from soil movement during or after construction. If a shallow foundation system is in place, additional stiffening of the retaining wall may be needed to minimize lateral movements.

For vibratory impacts, engineers studied the vibrations induced by types of equipment likely to be used for NHHIP construction activities in terms of velocity and frequency, as well as distance to the Cheek-Neal building. Vibration generated by construction equipment likely to be used during I-45 construction and US 59/I-69 reconstruction would not be significant; that is, it would not meet the threshold for structural damage to historic buildings from continuous or transient vibration sources at 25 feet from the building face. The engineers also studied the potential for traffic vibration, particularly low-

frequency sound levels produced by trucks. Based on the distance between the I-45 and US 59/I-69 facilities and the Cheek-Neal building, traffic-induced vibration would be under the annoyance threshold as well as the structural damage threshold.

Throughout Section 106 coordination, TxDOT determined that the proposed action would have an adverse effect to the Cheek-Neal property as a result of the amount of property needed for the project.

Segment 3/Alternative 10

Segment 3/Alternative 10 would widen I-45 on its current alignment on the west and south sides of downtown Houston. No work related to NHHIP would take place along existing US 59/I-69 in the vicinity of the Cheek-Neal property. Alternative 10 would avoid use of land from the Cheek-Neal property. The Cheek-Neal property parcel would be located 100 feet southeast of the US 59/I-69 ROW at its closest proximity. The Cheek-Neal building would be located 160 feet east of the existing US 59/I-69 ROW, 170 feet east of Chartres Street, which functions as a de facto access road, and 210 feet east of the elevated US 59/I-69 main lanes.

Segment 3/original Alternative 11

Alternative 11 would shift the I-45 alignment to parallel I-10 and US 59/I-69, along the existing I-10 alignment on the north side of downtown Houston and along the US 59/I-69 alignment on the east side of downtown Houston. In the vicinity of the Cheek-Neal property, an additional elevated structure to carry northbound and southbound I-45 would be constructed immediately east of the existing US 59/I-69 elevated structures. The new elevated structure would carry three travel lanes and inside and outside shoulders in each direction of traffic. The new elevated structure would be the same height as existing US 59/I-69 structures. Existing US 59/I-69 structures would remain in place. Chartres Street would be reconstructed on a slightly new location and would continue to serve as a one-way northbound access road and would be located partially under the superstructure of the new I-45 northbound elevated structure which would narrow the overall ROW width.

To accommodate the additional freeway width, an 85-foot-wide strip of additional ROW would be acquired on the east side of existing US 59/I-69, for a total ROW width of 310 feet. Original Alternative 11 would avoid use of land from the Cheek-Neal property. The Cheek-Neal property parcel would be located 15 feet east of the I-45 and US 59/I-69 ROW at its closest proximity. The Cheek-Neal Building would be located 75 feet east of the closest I-45 and US 59/I-69 ROW.

Segment 3/Alternative 12

Segment 3/Alternative 12 would convert the downtown loop into a partial one-way loop by realigning I-45 northbound lanes along the existing US 59/I-69 alignment and maintaining two-directional flow on existing I-10 and US 59/I-69. In the vicinity of the Cheek-Neal property, an additional elevated structure would be constructed immediately east of the existing US 59/I-69 elevated structures. The new elevated structure would carry four northbound I-45 travel lanes, and inside and outside shoulders. The new elevated structure would be the same height as existing US 59/I-69 structures. Chartres Street would be reconstructed on a slightly new location and would continue to serve as a one-way northbound frontage road. Chartres Street would be located partially under the superstructure of the new I-45 northbound elevated structure to narrow overall ROW width.

To accommodate the additional freeway width, a 30-foot-wide strip of additional ROW would be acquired on the east side of existing US 59/I-69, for a total ROW width of 255 feet. Alternative 12 would avoid use of land from the Cheek-Neal property. The Cheek-Neal property parcel would be

located 70 feet east of the I-45 and US 59/I-69 ROW at its closest proximity. The Cheek-Neal Building would be located 130 feet east of the closest I-45 and US 59/I-69 ROW.

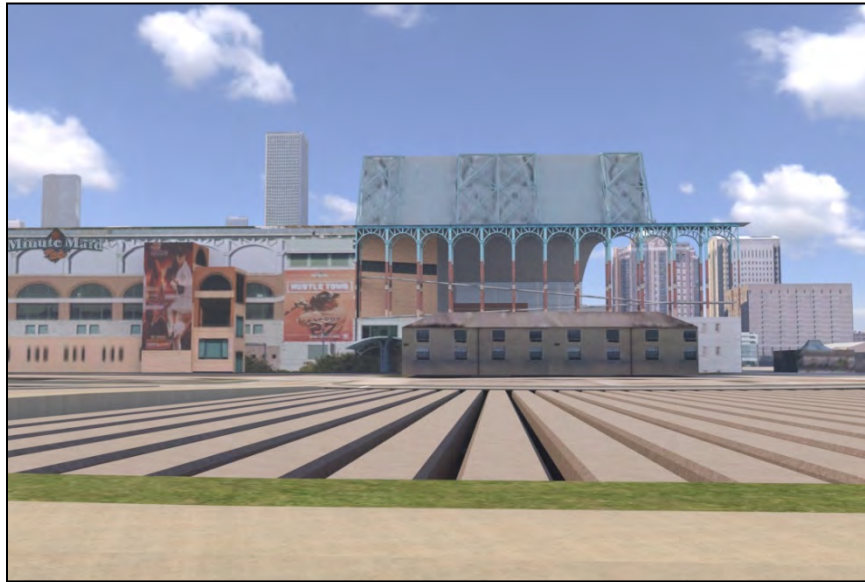


Figure 4-6: Digital rendering of the proposed new depressed roadway of the Proposed Action adjacent to Cheek Neal as it would look as completed by TxDOT.

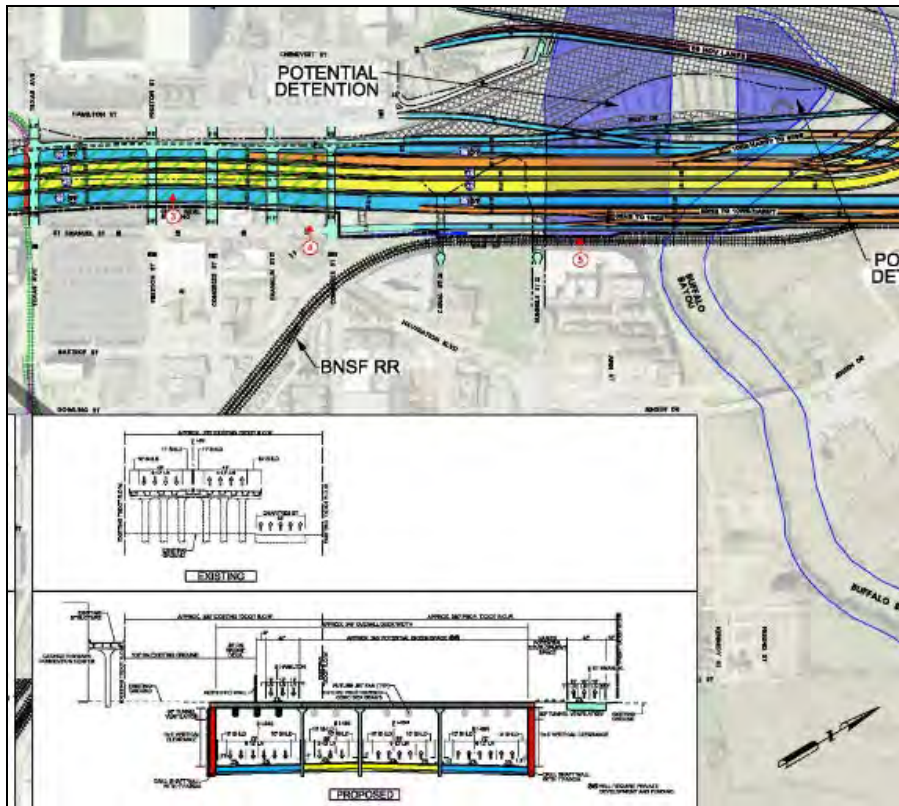


Figure 4-7: Preliminary design schematic exhibit showing Cheek Neal building in relation to the Proposed Action.

4.4 Rossonian Cleaners

This section describes the impacts of the proposed action and the three Reasonable Alternatives to the Rossonian Cleaners property.

Proposed Action – Segment 3/Alternative 11

The NHHIP would include addition of travel lanes to US 59/I-69 to four travel lanes in each direction and reconstruction of the US 59/I-69 at SH 288 interchange. At the Rossonian Cleaners location, the closest freeway lanes would be a two-lane southbound US 59/I-69 frontage road along the ROW boundary and a reconstructed ramp from northbound SH 288 to southbound US 59/I-69. The NHHIP would acquire 0.079 acre of land from the Rossonian Cleaners property, or about 28.7 percent of the total parcel area. The ROW boundary would extend into the existing Rossonian Cleaners building and would require demolition of the c.1940-1945 addition that makes up the southern half of the building and would likely require acquisition and removal of the entire building.

TxDOT sought to minimize or avoid impacts to the Rossonian Cleaners property but was constrained by the property's proximity to the US 59/I-69 at SH 288 interchange and by the conversion of US 59/I-69 to a depressed configuration between Spur 527 and SH 288 to match the existing depressed freeways on both ends.

Through Section 106 coordination, TxDOT determined that the proposed action would have an adverse effect to the Rossonian Cleaners.

Segment 3/Alternative 10

Segment 3/Alternative 10 would widen I-45 on its current alignment on the west and south sides of downtown Houston. The Alternative 10 design and alignment is identical to the Proposed Action in the vicinity of the Rossonian Cleaners property. There would be identical impacts to the Section 4(f) property with ROW acquisition and demolition of part or all of the Rossonian Cleaners building as described for the Proposed Action. Alternative 10 would result in an adverse effect to the Rossonian Cleaners.

Segment 3/original Alternative 11

The original Alternative 11 would have the same impact to Rossonian Cleaners as the Proposed Action Alternative 11. The Alternative 11 design and alignment would be identical to the Proposed Action in the vicinity of the Rossonian Cleaners property. There would be identical impacts to the Section 4(f) property with ROW acquisition and demolition of part or all of the Rossonian Cleaners building as described for the Proposed Action. Original Alternative 11 would result in an adverse effect to the Rossonian Cleaners.

Segment 3/Alternative 12

Segment 3/Alternative 12 would convert the downtown loop into a partial one-way loop by realigning I-45 northbound lanes along the existing US 59/I-69 alignment and maintaining two-directional flow on existing I-10 and US 59/I-69. The Alternative 12 design and alignment is identical to the Proposed Action in the vicinity of the Rossonian Cleaners property. There would be identical impacts to the Section 4(f) property with ROW acquisition and demolition of part or all of the Rossonian Cleaners building as described above. Alternative 12 would result in an adverse effect to the Rossonian Cleaners.

4.5 Former Downtown Houston Post Office, Processing and Distribution Center

This section describes the impacts of the proposed action and the three Reasonable Alternatives to the Former Downtown Houston Post Office, Processing and Distribution Center property.

Proposed Action – Segment 3/Alternative 11

With the NHHIP, I-45 would be relocated north and east of downtown Houston and the Pierce Elevated would be replaced with a “Downtown Connector” that provides access from I-45 and I-10 to the west side of downtown. The Downtown Connector would be constructed with three to four travel lanes in each direction, generally within existing I-45 ROW. However, a narrow strip of ROW would be acquired for a ramp between the northbound Downtown Connector and eastbound I-10. The NHHIP would acquire about 904 square feet (0.021 acre) of land from the property, representing about 0.13 percent of the total parcel area. The ROW to be taken is a small portion of the paved parking area adjacent to existing I-45 and northwest of the former post office building. The proposed project would have no direct effect to the NRHP-listed building. Indirect effects would be negligible, as there is already considerable noise and visual intrusion from existing I-45. The existing Pierce Elevated was constructed in the mid-1960s, in the same period as the former post office building. The NHHIP would have no adverse effect to the Former Downtown Houston Post Office, Processing and Distribution Center at 401 Franklin Street. TxDOT will prepare a determination of *de minimis* impact to this property.

Segment 3/Alternative 10

Alternative 10 would have the same impact to the Former Downtown Houston Post Office, Processing and Distribution Center as the Proposed Action Alternative 11.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

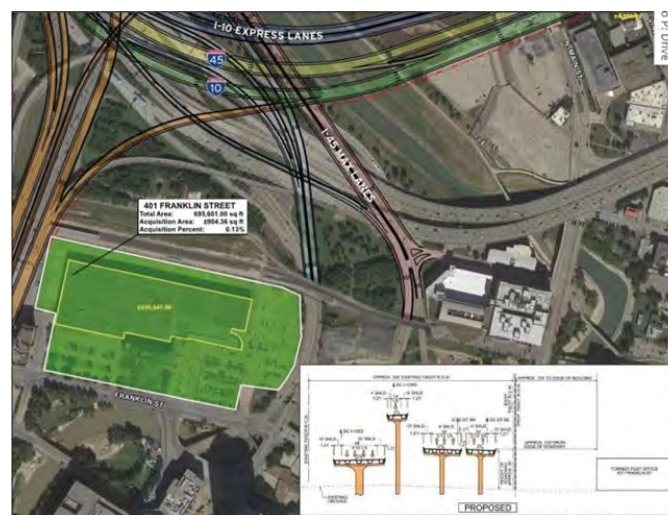


Figure 4-8: Preliminary schematic showing Former Houston Downtown Post Office, Processing and Distribution Center.

4.6 Parks

The following sections discuss the parks and their impacts from the three reasonable alternatives and the Proposed Action.

4.6.1 White Oak Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to White Oak Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.2 American Statesmanship Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to American Statesmanship Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.3 Buffalo Bayou Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Buffalo Bayou Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.4 Baldwin Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Baldwin Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.5 Houston Academy for International Studies SPARK Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Houston Academy for International Studies SPARK Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.6 Peggy’s Point Plaza Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Peggy’s Point Plaza Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.7 Peggy Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Peggy Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.8 James Bute Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to James Bute Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.9 Freed Art and Nature Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Freed Art and Nature Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

Alternative 10 would require 0.21 acre of new right-of-way in the southeast corner of Freed Art and Nature Park. The function of the park would not be impaired, and its function would not cease. Therefore, these minor changes would have no adverse effect. It is not known if the City of Houston would concur with a *de minimis* impact finding.

Segment 3/original Alternative 11

Original Alternative 11 would require approximately 0.21 acre of new right-of-way in the southeast corner of Freed Art and Nature Park. The function of the park would not be impaired and its function

would not cease. Therefore, these minor changes would have no adverse effect. It is not known if the City of Houston would concur with a *de minimis* impact finding.

Segment 3/Alternative 12

Alternative 12 would require 0.21 acre of new right-of-way in the southeast corner of Freed Art and Nature Park. The function of the park would not be impaired, and its function would not cease. Therefore, these minor changes would have no adverse effect. It is not known if the City of Houston would concur with a *de minimis* impact finding.

4.6.10 Hogg Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Hogg Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

Alternative 10 would require 1.91 acres of new right-of-way from this 2-acre park. This is a significant portion of the park. Although the highway structure would bridge over the area of proposed new right-of-way, some bridge columns would be in the park, affecting use of the park land. The impact would be adverse.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

Alternative 12 would require 1.91 acres of new right-of-way from this park. This is a significant portion of the park. Although the highway structure would bridge over the area of proposed new right-of-way, some bridge columns would be in the park, affecting use of the park land. The impact would be adverse.

4.6.11 Linear Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Linear Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

Alternative 10 would require 0.40 acre of new right-of-way from this 7-acre park. The paved trails would not be impacted, the function of the park would not be impaired, and the park's function would not cease. It is not known if the City of Houston would concur with a *de minimis* impact finding.

Segment 3/original Alternative 11

Original Alternative 11 would require approximately 0.15 acre of new right-of-way in Linear Park (to the east of existing I-45). The paved trails in the park that connect this park with Buffalo Bayou Park and Downtown would not be impacted. The function of the park would not be impaired, and its function

would not cease. Therefore, these minor changes would have no adverse effect. It is not known if the City of Houston would concur with a *de minimis* impact finding.

Segment 3/Alternative 12

Alternative 12 would require 0.15 acre of new right-of-way from this park. The paved trails in the park that connect this park with Buffalo Bayou Park and Downtown would not be impacted. The function of the park would not be impaired, and its function would not cease. Therefore, these minor changes would have no adverse effect. It is not known if the City of Houston would concur with a *de minimis* impact finding.

4.6.12 Sam Houston Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Sam Houston Park.

Proposed Action – Segment 3/Alternative 11

No use; no adverse impact. The proposed action would significantly reduce the highway footprint in the area of Sam Houston park, creating opportunities for additional open space. With the proposed project, noise levels are predicted to decrease by 3 decibels at approximately the center of the park.

Segment 3/Alternative 10

Alternative 10 would require 0.29 acre of new right-of-way from this 20-acre park. No buildings would be impacted; however, loss of any land from this park would be an adverse impact and may not be considered a *de minimis* impact because of the park's age, cultural resources, and use by the community

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

Alternative 12 would require 0.33 acre of new right-of-way from this 20-acre park. No buildings would be impacted; however, loss of any land from this park would be an adverse impact and may not be considered a *de minimis* impact because of the park's age, cultural resources, and use by the community

4.6.13 Tranquility Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Tranquility Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.14 Emancipation Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Emancipation Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.15 Discovery Green

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Discovery Green.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.16 Guadalupe Plaza Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Guadalupe Plaza Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.17 Swiney Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Swiney Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.18 Hennessy Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Hennessy Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.19 Allen’s Landing Memorial Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Allen’s Landing Memorial Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.20 Confederate Ship Area Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Confederate Ship Area Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.21 Goyen Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Goyen Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.22 Brewster Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Brewster Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

4.6.23 Sesquicentennial Park

This section describes the impacts of the proposed action and the three Reasonable Alternatives to Sesquicentennial Park.

Proposed Action – Segment 3/Alternative 11

No use; no impact.

Segment 3/Alternative 10

No use; no impact.

Segment 3/original Alternative 11

No use; no impact.

Segment 3/Alternative 12

No use; no impact.

5 AVOIDANCE ALTERNATIVES

TxDOT used a comprehensive, multi-phase process to develop and evaluate a full range of project alternatives for highway improvements in the project corridor. Detailed information regarding the alternative analysis process is in Section 2 of the Final EIS. TxDOT also employed a phased approach to identify and evaluate potential historic properties and the effect of the NHHIP on historic properties. For the initial screening phase (which examined 30 build alternatives, 10 for each of the three project segments), a basic yes/no determination was made for the presence of community parks, cemeteries, and cultural resources. For the secondary screening phase (which examined 18 preliminary alternatives, six for each project segment), the evaluation took into account the number of NRHP-listed properties impacted by the alternative and other direct impacts to other known cultural resources.

TxDOT examined alternatives that would avoid use of any Section 4(f) property. These alternatives were removed from further consideration following the secondary screening process due to a combination of constructability issues, lack of functionality, and/or undesirable operations and maintenance requirements. None of the avoidance alternatives were determined to be feasible and prudent.

5.1 No-Build Alternative

Under this alternative, the project would not be constructed. The existing highway alignments would remain in the same configuration and no work would occur. Segment 3/Alternative 1 would avoid use of Section 4(f) properties. However, it would not address existing and projected traffic congestion along the I-45 corridor. Current traffic congestion would increase to “serious” to “severe” conditions by 2035, resulting in longer travel times and reduced mobility. I-45 would continue to be an ineffective evacuation route for the region in the event of a hurricane or other regional emergency. This alternative would not address safety concerns due to existing conditions such as narrow lane widths, narrow or nonexistent shoulders, low-clearance bridges, and functionally obsolete bridges. Segment 3/Alternative 1 is feasible from an engineering standpoint and would avoid use of Section 4(f) properties. However, it would not meet the project’s stated purpose and need and is therefore considered not prudent.

5.2 Segment 3/Alternative 2 – Transportation Systems Management/Travel Demand Management Upgrades

This alternative consists of upgrades to Transportation Systems Management (TSM) and travel demand management (TDM), which are transportation policies, strategies, or projects aimed at reducing traffic congestion and improving roadway mobility without major capital expenditures to increase physical roadway traffic capacity. Examples of potential TSM/TDM actions for limited-access freeways are dynamic message signs, ramp metering, reversible travel lanes, and focused interchange improvements. A TSM/TDM alternative would likely result in no use to Section 4(f) properties. However, early stage engineering analysis found that TSM/TDM projects would not improve the design of I-45 to the extent that I-45 and the downtown loop system would meet current roadway design criteria. Segment 3/Alternative 2 was therefore removed from consideration in the initial screening stage of analysis and evaluation and is considered not prudent.

5.3 Segment 3/Alternative 3 – One-Way Loop

Under Segment 3/Alternative 3, existing freeways in the downtown loop would be reconfigured into a one-way loop network. Analysis conducted during the secondary screening process found that this alternative would have undesirable impacts to freeway functionality and would result in increased travel times on the freeway system and on the downtown Houston local street system. With continued reliance on existing freeway facilities, this alternative would not use Section 4(f) properties. It would not meet the project's stated purpose and need and was therefore considered not prudent. See Attachment E for maps and typical sections for the avoidance alternatives.

5.4 Segment 3/Alternatives 4, 5, 6, 7, 9 – Tunnel

Five Segment 3 alternatives examined various scenarios for adding tunnels to the existing freeway facility to provide additional travel lanes and managed lanes. See Attachment E for maps and typical sections for the avoidance alternatives. Alternative 9 was removed from further consideration in the initial screening phase due to poor results in travel demand modeling. Alternatives 4 and 7 were carried forward into the secondary screening phase but removed during that phase as additional project alternatives that better met the project's purpose and need were developed and added to the alternatives analysis.

Two tunnel alternatives (Alternatives 5 and 6) were examined in the secondary screening phase of evaluation. Under Alternative 5, a tunneled roadway carrying four managed lanes would be constructed under existing I-45 and would then continue under Bagby Street before terminating at Spur 527. Under Alternative 6, a tunneled roadway carrying four managed lanes would be constructed under the existing I-45, continuing to Jefferson Street and terminating at I-45 south of the I-45 at US 59/I-69 interchange. For purposes of the secondary screening evaluation, it was assumed that any tunneling activity would be undertaken in a manner that would not disturb historic properties or park resources and would therefore have no use of Section 4(f) properties.

Engineering and traffic analyses found that the tunnel alternatives would have several major constructability issues, such as construction duration, high construction risks, staging/sequencing issues, complex and costly utility relocations, and limited contractor availability. The tunnel alternatives also pose major functionality issues. Limitations in tunnel size would result in reduced shoulder width and reduced height clearances for large-capacity vehicles. Emergency response time would increase, as would time to clear traffic accidents within the tunnel, creating congestion and

increasing travel times. For these reasons, the tunnel alternatives do not meet the project's purpose and need and are considered not prudent. Alternatives 5 and 6 were not carried forward beyond the secondary screening phase of evaluation.

6 LEAST OVERALL HARM ANALYSIS

TxDOT has held numerous meetings (over 500 meetings since 2012) with stakeholders and local community groups to gather input and feedback about the proposed designs, and through those meetings has made accommodations to historically significant neighborhoods like Germantown (NRHP-eligible historic district) and Near Northside (NRHP-listed historic district) to limit ROW acquired in these neighborhoods. Indeed, there is no new ROW proposed in Germantown, and the very limited ROW proposed within Near Northside is due to community requests for access ramps and crossings over I-45.

As discussed in Section 5, there are no feasible and prudent avoidance alternatives. Because the proposed action and three Reasonable Alternatives have a Section 4(f) use of the resource that results in greater than a *de minimis* impact, a least overall harm analysis is required to determine which alternative causes the least overall harm in light of the statute's preservation purpose. According to the regulations (23 CFR § 774.3), the "least overall harm" is determined by balancing the following factors:

- 1) The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property);
- 2) The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;
- 3) The relative significance of each Section 4(f) property;
- 4) The views of the official(s) with jurisdiction over each Section 4(f) property;
- 5) The degree to which each alternative meets the purpose and need for the project;
- 6) After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
- 7) Substantial differences in costs among the alternatives.

As outlined in the FHWA Section 4(f) Policy Paper, the first four criteria relate to the degree of harm to Section 4(f) properties. The other three criteria relate to any substantial problems on issues beyond Section 4(f). The seven criteria should be balanced to allow for consideration of all relevant concerns in order to determine which alternative would cause the least overall harm in light of the statute's preservation purpose. In balancing the factors, it may be determined that a serious problem identified in these factors might outweigh relatively minor net harm to a Section 4(f) resource. An evaluation of the potential "least harm" alternatives outlined in this section was conducted with respect to the seven factors, as summarized in Table 6-1.

Table 6-1. Summary of Least Overall Harm Analysis

Evaluation Factors	Proposed Action Alternative 11	Alternative 10	Original Alternative 11	Alternative 12
Number of Section 4(f) Resources that would have a Section 4(f) use	5	7	10	8
Section 4(f) Resources that may be Adversely Affected	<ul style="list-style-type: none"> • Houston Warehouse Historic District • Readers Distributors Warehouse - individually eligible and contributing resource to historic district (HD) • Carlisle Plastics North Warehouse - contributing resource to HD • Cheek Neal Coffee Company Building • Rossonian Cleaners 	<ul style="list-style-type: none"> • Houston Warehouse Historic District • San Jacinto Warehouses • Rossonian Cleaners • Freed Art and Nature Park • Linear Park • Hogg Park • Sam Houston Park 	<ul style="list-style-type: none"> • Houston Warehouse Historic District • Union Transfer Company Warehouse - individually eligible and contributing resource to HD • San Jacinto Warehouses – contributing resource to HD • Gulf Coast Implement – contributing resource HD • Rossonian Cleaners • Freed Art and Nature Park • Linear Park • Hogg Park • Sam Houston Park 	<ul style="list-style-type: none"> • Houston Warehouse Historic District • San Jacinto Warehouses – contributing resource to HD • Gulf Coast Implement – contributing resource HD • Rossonian Cleaners • Freed Art and Nature Park • Linear Park • Hogg Park • Sam Houston Park
1) Ability to mitigate adverse impacts	<p>Proposed mitigation for adverse impacts is discussed in detail in Section 8.</p> <ul style="list-style-type: none"> • Houston Warehouse Historic District: The project right-of- 	<ul style="list-style-type: none"> • Houston Warehouse Historic District: Proposed mitigation would be the same as for Alt. 11. 	<ul style="list-style-type: none"> • Houston Warehouse Historic District: Proposed mitigation would be the same as for Alt. 11. 	<ul style="list-style-type: none"> • Houston Warehouse Historic District: Proposed mitigation would be the same as for Alt. 11.

Evaluation Factors	Proposed Action Alternative 11	Alternative 10	Original Alternative 11	Alternative 12
	<p>way was minimized to avoid and minimize impacts to 4(f) resources in the historic district. Proposed mitigation includes documentation of two contributing resources within the district and preparation of a comprehensive survey of similar early and mid-twentieth century warehouses in the East Downtown area.</p> <ul style="list-style-type: none"> • Readers Distributors Warehouse: The building would be demolished. Proposed Mitigation includes documentation of the building and preparation of a comprehensive survey of similar early and mid-twentieth century warehouses in the East Downtown area. • Carlisle Plastics North Warehouse: The building would be demolished. Proposed mitigation includes documentation of the warehouse and preparation of a comprehensive survey of similar early and mid-twentieth century warehouses in the East Downtown area. TxDOT will include design 	<ul style="list-style-type: none"> • San Jacinto Warehouses: Portions of the building would be demolished. Proposed mitigation would include documentation of the building and preparation of a comprehensive survey of similar early and mid-twentieth century warehouses in the East Downtown area. • Rossonian Cleaners: Proposed mitigation is documentation and intensive survey. • Former Downtown Houston Post Office, Processing and Distribution Center: TxDOT minimized right-of-way acquisition at this property and the impact would be considered <i>de minimis</i>. No mitigation would be proposed. • Freed Art and Nature Park: The impacts to this park might not be considered <i>de minimis</i> by the City of Houston. Mitigation would be coordinated by TxDOT and the City of Houston. • Linear Park: The impacts to this park might not be considered <i>de minimis</i> by the City of Houston. Mitigation 	<ul style="list-style-type: none"> • For demolition of Union Transfer Company Warehouse, portions of San Jacinto Warehouses, portions of Gulf Coast Implement, Henke's Grocery, Tony's Barber Shop, and Fifth Ward Hotel, proposed mitigation would include documentation of the buildings and preparation of a comprehensive survey of similar early and mid-twentieth century warehouses in the East Downtown area. • Freed Art and Nature Park: The impacts to this park might not be considered <i>de minimis</i> by the City of Houston. Mitigation would be coordinated by TxDOT and the City of Houston. • Linear Park: The impacts to this park might not be considered <i>de minimis</i> by the City of Houston. Mitigation would be coordinated by TxDOT and the City of Houston. 	<ul style="list-style-type: none"> • For demolition of portions of San Jacinto Warehouses, and demotion of Gulf Coast Implement, proposed mitigation would include documentation of the buildings and preparation of a comprehensive survey of similar early and mid-twentieth century warehouses in the East Downtown area. • Rossonian Cleaners: Proposed mitigation is documentation and intensive survey. • Freed Art and Nature Park: The impacts to this park might not be considered <i>de minimis</i> by the City of Houston. Mitigation would be coordinated by TxDOT and the City of Houston. • Linear Park: The impacts to this park might not be considered <i>de minimis</i> by the City of Houston. Mitigation would be coordinated by TxDOT and the City of Houston. • Hogg Park: The impacts to this park would be significant. Mitigation would likely involve purchase of land to replace

Evaluation Factors	Proposed Action Alternative 11	Alternative 10	Original Alternative 11	Alternative 12
	<p>prescriptives for the construction contractor to avoid damage to the adjacent Carlisle Plastics South Warehouse during demolition of the north warehouse and will provide the demolition plan in advance to the SHPO for review and consultation.</p> <ul style="list-style-type: none"> • Cheek Neal Coffee Company Building: TxDOT minimized right-of-way acquisition at this property and avoided direct impacts to the building. Proposed mitigation is to collect historical and archival information about the property and make available to the public, such as placing interpretive signage nearby. • Rossonian Cleaners: Proposed mitigation is documentation and intensive survey. • Former Downtown Houston Post Office, Processing and Distribution Center: TxDOT minimized right-of-way acquisition at this property and the impact would be considered <i>de minimis</i>. No mitigation is proposed. 	<p>would be coordinated by TxDOT and the City of Houston.</p> <ul style="list-style-type: none"> • Hogg Park: The impacts to this park would be significant. Mitigation would likely involve purchase of land to replace the impacted portion of the park or establish a new park in the vicinity. • Sam Houston Park: The impacts to this park might not be considered <i>de minimis</i> by the City of Houston. Mitigation would be coordinated by TxDOT and the City of Houston. 		<p>the impacted portion of the park or establish a new park in the vicinity.</p> <ul style="list-style-type: none"> • Sam Houston Park: The impacts to this park might not be considered <i>de minimis</i> by the City of Houston. Mitigation would be coordinated by TxDOT and the City of Houston.

Evaluation Factors	Proposed Action Alternative 11	Alternative 10	Original Alternative 11	Alternative 12
	<ul style="list-style-type: none"> Segment 3 will be a design build project where TxDOT provides the schematics to the bidding contractor with the restrictions and prescriptives. Strict technical provisions would be provided to contractors with clear guidance about historical properties and what would not be permitted to occur near them. The contractor must commit to building the project in the schematics as they are shown. The design build office will notify TxDOT ENV of any changes to these schematics in vicinity of historic properties so that proper coordination with consulting parties and SHPO can occur if needed. 			
2) Relative severity of harm, after mitigation	<ul style="list-style-type: none"> Houston Warehouse Historic District: Two of 31 4(f) resources contributing to NRHP-eligible historic district would be demolished: Readers Distributors Warehouse and Carlisle Plastics North Warehouse. Three 4(f) resources would be demolished: Readers Distributors Warehouse, 	<ul style="list-style-type: none"> Houston Warehouse Historic District: One of 31 4(f) resources contributing to NRHP-eligible historic district would be partially demolished: San Jacinto Warehouses. One 4(f) resource would be demolished: Rossonian Cleaners. One 4(f) resource would have <i>de minimis</i> impacts: Former 	<ul style="list-style-type: none"> Houston Warehouse Historic District: Five of 31 4(f) resources contributing to NRHP-eligible historic district would be demolished or partially demolished: Union Transfer Company Warehouse, portions of San Jacinto Warehouse building, Gulf Coast Implement, Henke's Fifth 	<ul style="list-style-type: none"> Houston Warehouse Historic District: Two of 31 4(f) resources contributing to NRHP-eligible historic district would be demolished or partially demolished: portions of San Jacinto Warehouses and all of Gulf Coast Implement. Two NRHP-eligible 4(f) resources would be

Evaluation Factors	Proposed Action Alternative 11	Alternative 10	Original Alternative 11	Alternative 12
	<p>Carlisle Plastics North Warehouse, & Rossonian Cleaners would be demolished.</p> <ul style="list-style-type: none"> • A small portion of the parking lot at the Cheek Neal Coffee Company Building property would be affected. The building would not be adversely impacted with successful use of measures during construction of the proposed project. • Four 4(f) resources would have <i>de minimis</i> impacts: San Jacinto Warehouse, Former Bottling Works, and the METRO Warehouse and the Former Downtown Houston Post Office, Processing and Distribution Center. 	<p>Downtown Houston Post Office, Processing and Distribution Center</p> <ul style="list-style-type: none"> • Minimal right-of-way would be required from Freed Art and Nature Park and Linear Park. This would not result in adverse changes to park activities, features, or attributes. • Mitigation for impacts to Hogg Park would likely involve purchase of land to replace the impacted portion of the park or establish a new park in the vicinity. • Mitigation for right-of-way impacts to Sam Houston Park would be coordinated by TxDOT and the City of Houston. 	<p>Ward Grocery, Tony's Barber Shop (also individually NRHP-eligible), Fifth Ward Hotel.</p> <ul style="list-style-type: none"> • A small portion of the parking lot at the Cheek Neal Coffee Company Building property would be affected. The building would not be impacted with successful use of measures during construction of the proposed project. • A small amount of parkland would be affected in both Freed Art and Nature Parks. This would not result in adverse changes to park activities, features, or attributes. 	<p>demolished: Gulf Coast Implement, Rossonian Cleaners.</p> <ul style="list-style-type: none"> • Minimal right-of-way would be required from Freed Art and Nature Park and Linear Park. This would not result in adverse changes to park activities, features, or attributes. • Mitigation for impacts to Hogg Park would likely involve purchase of land to replace the impacted portion of the park or establish a new park in the vicinity. • Mitigation for right-of-way impacts to Sam Houston Park would be coordinated by TxDOT and the City of Houston.
3) Relative significance of each 4(f) property	All historic properties and parks have equal significance.	All historic properties and parks have equal significance.	All historic properties and parks have equal significance.	All historic properties and parks have equal significance.
4) Views of officials with jurisdiction	The SHPO and ACHP concurrence on determinations of eligibility and effect for this project, as well as the proposed mitigation process are embedded in the Section106 PA for this project (see Appendix R of the Final EIS).	The SHPO and ACHP concurrence on determinations of eligibility and effect for this project are embedded in the Section106 PA for this project (see Appendix R of the Final EIS).	The SHPO and ACHP concurrence on determinations of eligibility and effect for this project are embedded in the Section106 PA for this project (see Appendix R of the Final EIS).	The SHPO and ACHP concurrence on determinations of eligibility and effect for this project are embedded in the Section106 PA for this project (see Appendix R of the Final EIS).

Evaluation Factors	Proposed Action Alternative 11	Alternative 10	Original Alternative 11	Alternative 12
	<p>The City of Houston had concerns about potential impacts to visual quality, noise, and historic resources at Sam Houston Park. TxDOT addressed the concerns and the proposed action would not adversely affect the park.</p>	<p>The City of Houston did not comment about this alternative.</p>	<p>The City of Houston did not comment about this alternative.</p>	<p>The City of Houston did not comment about this alternative.</p>
<p>5) Degree to which each Alternative meets the purpose and need for the project</p>	<p>Rated as: “Desirable” for Reduction in Systemwide Delay “Desirable” for Increase in Systemwide Travel Speed “Desirable” for Improvement to Freeway Ramping/Access</p> <p>The Proposed Action Alternative 11 would result in reductions in systemwide delay by over 30%, increased systemwide travel speeds by approximately 20 mph, increased safety by improving current freeway ramping/access points and adding new ramping/access, and reducing expected crashes by 30% on I-45 and I-610, 43% on SH 288, and 60% on I-10 and US 59/I-69. Therefore, it was selected as the most effective</p>	<p>Rated as: “Neutral” for Reduction in Systemwide Delay “Neutral” for Increase in Systemwide Travel Speed “Undesirable” for Improvement to Freeway Ramping/Access</p> <p>Speeds would increase slightly on I-45. Speeds would increase slightly on I-45 and US 59/I-69 but, overall, speeds on the Downtown highways system would increase by 8 mph. The existing “chicken merge”, where the traffic bottlenecks on US 59/I-69 between SH 288 and I-45, would remain in place; this is a major cause of decreased traffic speeds in and around the area. Alternative 10 would not meet the purpose and</p>	<p>Rated as: “Neutral” for Reduction in Systemwide Delay “Neutral” for Increase in Systemwide Travel Speed “Neutral” for Improvement to Freeway Ramping/Access</p> <p>Speeds would increase slightly on I-45. Speeds would increase slightly on I-45 and US 59/I-69 but, overall, speeds on the Downtown highways system would increase by 10 mph. Original Alternative 11 would not meet the purpose and need for the project as well as Alternative 11.</p>	<p>Rated as: “Neutral” for Reduction in Systemwide Delay. “Undesirable” for Increase in Systemwide Travel Speed “Undesirable” for Improvement to Freeway Ramping/Access</p> <p>Speeds would decrease on I-10. Speeds would increase on I-45 and US 59/I-69 but, overall, speeds on the Downtown highways system decrease slightly (1 mph), and the project would not meet the purpose. Alternative 12 would not meet the purpose and need for the project as well as Alternative 11.</p>

Evaluation Factors	Proposed Action Alternative 11	Alternative 10	Original Alternative 11	Alternative 12
	engineering solution to address the purpose and need.	need for the project as well as Alternative 11.		
6) Magnitude of adverse impacts to non-Section 4(f) resources after mitigation	Community impacts due to displacement of housing, businesses, places of worship, and other facilities, due to the amount of new ROW. Overall, numbers of displacements are comparable to Alt. 12, but more than original Alt. 11 and Alt. 10. Noise impacts; mitigation is proposed to offset noise impacts. More displacements of Environmental Justice (EJ) housing and facilities due to displacement of public housing facilities and facilities that provide services to homeless and other low-income individuals. Some of the mitigation measures to minimize and offset adverse impacts to EJ populations include advance acquisition of public housing, places of worship, and other facilities serving the communities; ensuring that public housing is reestablished so that residents only have to relocate once; providing funding for construction of new low-income housing in	Community impacts due to displacement of housing, businesses, places of worship, and other facilities. Numbers of all types of displacements are less than Alt. 11 (Proposed Action), original Alt. 11, and Alt. 12. Noise impacts; some mitigation would be proposed. More visual impacts than other alternatives due to new and widened elevated structures on all four sides of Downtown.	Community impacts due to displacement of housing, businesses, places of worship, and other facilities. Overall, numbers of displacements are comparable to Alt. 10 and Alt. 12, and more than Alt. 11. Noise impacts; some mitigation would be proposed. Removal of Pierce Elevated would improve the visual quality on the west and south side of Downtown.	Community impacts due to displacement of housing, businesses, places of worship, and other facilities. Overall, numbers of displacements are comparable to Alt. 11 (Proposed Action), less than original Alt. 11, and more than Alt. 10. Noise impacts; some mitigation would be proposed. Elevated I-10 express lanes would create additional visual barrier Near Northside and central Downtown. Elevated lanes on east side of US 59/I-69 would create additional visual barrier between central and east Downtown

Evaluation Factors	Proposed Action Alternative 11	Alternative 10	Original Alternative 11	Alternative 12
	neighborhoods; and other measures. TxDOT is finalizing proposed measures to mitigate for the impacts of the displacement of facilities and services, and other impacts. The proposed mitigation measures to minimize and mitigate for adverse impacts are detailed in the NHHIP Community Impacts Assessment Technical Report.			
7) Substantial differences in costs	Cost was not a factor for evaluation of alternatives.	Cost was not a factor for evaluation of alternatives.	Cost was not a factor for evaluation of alternatives.	Cost was not a factor for evaluation of alternatives.

All of the alternatives would have adverse impacts to Section 4(f) resources. Alternatives 10, original 11, and 12 would cause greater harm to Section 4(f) resources than the proposed action.

All seven factors for identifying the alternative with the least overall harm have been considered.

1. Alternative 11 (Proposed Action) has less severe impacts to Section 4(f) resources than Alternative 10, original Alternative 11 and Alternative 12.
2. The Proposed Action would have adverse impacts to historic properties. TxDOT has coordinated with SHPO and ACHP regarding mitigation for the proposed action's adverse impacts to historic resources and has received their concurrence on the mitigation process.
3. Significance - All of the historic properties and parks evaluated in this report are significant and are equal in their degree of significance."
4. Views of officials with jurisdiction - The SHPO agreed with the NRHP-eligibility of the 4(f) resources and adverse effects determinations and provided input to and approval for the proposed mitigation. In addition, the ACHP also concurred with the determinations and the mitigation process.
5. While technically meeting the purpose and need to some degree, Alternatives 10, original 11 and 12, do not meet them to the degree that the Preferred Alternative does. The Proposed Action improves mobility across the system better than other alternatives, as shown in Table 6-1. Alternatives 10, original 11, and 12 are not prudent with respect to the stated purpose and need as they do not improve mobility throughout the entire Segment 3 area. Alternative 11 (Proposed Action) provides the greatest improvement to traffic mobility for highways in the Downtown Houston area, and best meets the purpose and need of project. Alternative 10, original Alternative 11, and Alternative 12 were rated as neutral or undesirable for three engineering evaluation criteria, which make these alternatives not prudent as compared to Alternative 11 (Proposed Action), which is rated desirable for the three criteria.
6. All of the alternatives would have adverse effects to non-Section 4(f) resources that TxDOT would not be able to fully offset or mitigate. All of the alternatives would have adverse effects to low-income and minority communities, including displacements of residents and traffic noise impacts. Alternative 10 has the least number of displacements of housing, businesses, places of worship, and other community facilities, and the most adverse visual impacts due to new and widened elevated structures on all four sides of Downtown Houston. Alternative 11 (Proposed Action) displaces more residences, including public housing, and facilities that support homeless and other low-income individuals. TxDOT is finalizing proposed mitigation measures for the impacts of the displacement of facilities and services, and impacts to other non-Section 4(f) resources.
7. Cost estimates were not developed for the alternatives; therefore, cost was not a factor in the evaluation of alternatives.

Taking all these factors into account, Alternative 11 would cause the least overall harm in light of Section 4(f)'s preservation purpose.

7 MEASURES TO MINIMIZE HARM

The Proposed Action has incorporated all possible planning to minimize harm to and preserve the historic activities, features, or attributes of each Section 4(f) property, as discussed below. As a result, six properties would have *de minimis* impacts, as discussed in previous sections: Near Northside Historic District; Residential property at 109 Carl Street; San Jacinto Warehouse; Walter's Downtown

(former Bottling Works); METRO Warehouse; and Former Downtown Post Office, Processing and Distribution Center.

The measures to minimize harm for the five historic properties that would be adversely affected are discussed below.

7.1 *Houston Warehouse Historic District and Contributing Resources*

The overall NHHIP design has been modified to reduce direct impacts to historic properties including modification of the Segment 3/Alternative 11 alignment in the vicinity of the Houston Warehouse Historic District. In the northwest and north-central portions of the historic district, the I-45 and I-10 roadways would be carried on several elevated structures. These structures would be cantilevered over one another to reduce ROW width. Local streets used as one-way frontage roads would be placed underneath the elevated I-10 main-lane structures, also reducing ROW width. The narrower roadway section in this vicinity allows for retention of the Carlisle Plastics South Warehouse and avoids demolition of the San Jacinto Warehouse, former Bottling Works, and METRO Warehouse, all contributing resources to the historic district.

While the proposed action would include acquisition of more land than the other Reasonable Alternatives, much of the land acquisition is limited to the Readers Distributors Warehouse property at the north edge of the historic district, with reduced impacts to most of the district's contributing resources in comparison to other alternatives. The proposed action would remove the existing I-10 elevated structure that bisects the historic district and would extend San Jacinto Street north to provide connectivity between these two formerly discontinuous portions of the historic district.

7.2 *Carlisle Plastics North Warehouse*

The overall NHHIP design has been modified to reduce direct impacts to historic properties, including modification of the Segment 3/Alternative 11 alignment in the vicinity of the Houston Warehouse Historic District. In the vicinity of the Carlisle Plastic North Warehouse and other nearby historic properties, the I-45/I-10 roadways would be carried on several elevated structures. These structures would be cantilevered over one another to reduce ROW width. Local streets used as one-way frontage roads would be placed underneath the elevated I-10 main-lane structures, also reducing ROW width. The narrower roadway section in this vicinity allows for retention of the Carlisle Plastics South Warehouse and avoids demolition of part or all of the San Jacinto Warehouse and the former Bottling Works, located west of the Carlisle Plastics Warehouse buildings. In this area, an existing railroad track is a constraint to the north of the Houston Warehouse Historic District, and the proposed ROW is as narrow as it can be to accommodate the Proposed Action, which best meets the purpose and need for the proposed project.

7.3 *Readers Distributors Warehouse*

While the Readers Warehouse would be demolished under the proposed action, the overall NHHIP design has been modified to reduce direct impacts to historic properties including modification of the Segment 3/Alternative 11 alignment in the vicinity of the Houston Warehouse Historic District. In the vicinity of the Readers Warehouse and other nearby historic properties, the I-45 and I-10 roadways would be carried on several elevated structures. These structures would be cantilevered over one another to reduce ROW width. Local streets used as one-way frontage roads would be placed underneath the elevated I-10 main-lane structures, also reducing ROW width. The narrower roadway section in this vicinity avoids demolition of part or all of the San Jacinto Warehouse and the former

Bottling Works, located west and southwest of the Readers Warehouse. In this area, an existing railroad track is a constraint to the north of the Houston Warehouse Historic District, and the proposed ROW is as narrow as it can be to accommodate the Proposed Action, which best meets the purpose and need for the proposed project.

7.4 Cheek Neal Coffee Company Building

The overall NHHIP design has been modified to reduce impacts to historic properties, including modification of Segment 3/Alternative 11 to provide a depressed configuration for I-45/I-69 on the east side of downtown, rather than the elevated structure originally included in Alternative 11. While the depressed configuration increases the direct ROW acquisition from the Cheek-Neal property, it reduces the considerable visual and noise impacts associated with expansion of the existing elevated freeway.

Hamilton Street and Chartres Street, which currently serve as one-way streets and de facto access roads on either side of US 59/I-69, would be reconfigured under the Proposed Action. Hamilton Street would continue as a one-way southbound street but would be relocated on the highway cap over the I-45/I-69 freeway lanes. Chartres Street would not be reconstructed on the east side of I-45/I-69. Existing St. Emanuel Street would instead serve as a northbound access road. The reconfiguration of local surface streets would reduce overall ROW in the vicinity of the Cheek-Neal property, and would avoid demolition of the Cheek-Neal Building. The Design-Build (DB) contractor would perform a traffic study for traffic volumes on St. Emanuel Street prior to construction, during construction, and after construction when the street is converted to one-way traffic. The traffic study would assess if additional or excessive vibratory impacts to the Cheek-Neal Building result from the changes to St. Emanuel Street traffic flow.

TxDOT would also incorporate design specification requirements to the DB Agreement for implementation during final design, to avoid potential adverse soil movement and vibratory impacts to the Cheek-Neal property. Prior to any work, the DB contractor would assess existing building foundation and soil conditions and would recommend potential strategies for avoiding impacts to the Cheek-Neal Building. The DB contractor would install instrumentation to monitor the effects of vibration during construction and in service, in accordance with an instrumentation plan reviewed and approved by TxDOT prior to work. The DB contractor would be required to cease work and develop mitigation measures if the vibration level exceeds identified thresholds.

7.5 Rossonian Cleaners

TxDOT has undertaken design modifications to minimize impacts to the Rossonian Cleaners; however, several factors limited TxDOT's ability to avoid the Rossonian Cleaners property. The Proposed Action includes converting the existing freeway from elevated to depressed (or below grade) between Spur 527 and SH 288 to match the existing depressed freeway configuration on both ends. This conversion required shifting the existing US 59/I-69 southbound to the Fannin Street exit from the current location south of Alameda Road to north of Alameda Road. This shifted ramp also includes an extension southbound of the parallel Chenevert Street to reconnect drivers directly to SH 288, as exists today. The existing connection from Chenevert Street to SH 288 needs to be removed to accomplish the planned improvements to remove the short weave sections between SH 288 and I-45. These conversion conditions and the proximity of Alameda Road and the Rossonian Cleaners property to the US 59/I-69 at SH 288 interchange made avoiding the property not feasible. The design team also studied shifting the US 59/I-69 alignment to the south away from the property, but this shift would

result in moving the US 59/I-69 northbound to SH 288 southbound connection closer to residences within a potential historic district, and would create conflicts with critical connections between US 59/I-69 and SH 288.

The Proposed Action would convert the existing US 59/I-69 freeway from an elevated profile to a depressed (or below grade) configuration between Spur 527 and SH 288 to match the existing depressed freeway configuration on both ends. This conversion required shifting the existing exit from southbound US 59/I-69 to Fannin Street from the current location south of Alameda Road to north of Alameda Road. Traffic exiting from southbound US 59/I-69 main lanes would merge into the southbound frontage road just north of the Rossonian Cleaners. To minimize impacts to the Rossonian Cleaners and other properties, TxDOT reduced the southbound frontage road design to two lanes. Further reductions to the roadway width or horizontal shifts of the roadway would not be prudent.

The proximity of the Rossonian Cleaners property to the US 59/I-69 at SH 288 interchange also constrained design modifications. To reduce impacts to the Rossonian Cleaners and other properties, TxDOT tightened the curvature of the northbound SH 288 to southbound US 59/I-69 ramp in this location to reduce ROW acquisition, with design speeds reduced to 45 miles per hour given the sharper curvature. The design team also studied shifting the US 59/I-69 alignment southward, but the southward shift would result in moving the northbound US 59/I-69 to southbound SH 288 ramp closer to residences in the NRHP-eligible Third Ward Historic District and also created alignment conflicts with critical connections between US 59/I-69 and SH 288, making this shift infeasible from an engineering standpoint.

8 MITIGATION

8.1 *Houston Warehouse Historic District*

TxDOT coordinated with SHPO, ACHP, and consulting parties regarding potential mitigation measures to compensate for impacts of the NHHIP to the Houston Warehouse Historic District, as well as to other historic properties. TxDOT will document two contributing resources within the historic district (Readers Distributors Warehouse and Carlisle Plastic North Warehouse) to Historic American Building Survey (HABS) Level I/Level II standards, with large-format photography, measured drawings of the building or full-size Mylar copies of as-built building plans, and a detailed textual history and description of the building. TxDOT will also conduct a comprehensive survey of similar early and mid-twentieth-century warehouses in the East Downtown (EaDo) area, in an effort to identify relevant property types, evaluate relative significance of individual properties, and provide information to facilitate future planning decisions relating to historic properties in the area. The mitigation documents will be available to the public online and at local repositories such as the City of Houston's Historic Preservation Office and the Julia Ideson Historic Library.

8.2 *Carlisle Plastics North Warehouse*

TxDOT will include a design prescriptive requirement in the design-build contract to obtain a demolition plan prior to any work on the Carlisle Plastics North Warehouse. TxDOT will provide the demolition plan to the SHPO for review and consultation. TxDOT will also include design prescriptives to avoid damage to the Carlisle Plastics South Warehouse in the demolition process. TxDOT will provide exterior and interior photographs of both buildings prior to any demolition work. Interior photographs of both buildings will be provided following ROW acquisition.

TxDOT coordinated with SHPO, ACHP, and consulting parties regarding potential mitigation measures to compensate for impacts of the NHHIP to the Carlisle Plastics North Warehouse, as well as to other historic properties. TxDOT will document the Carlisle Plastics North Warehouse to Historic American Building Survey (HABS) Level I/Level II standards, with large-format photography, measured drawings of the building or full-size Mylar copies of as-built building plans, and a detailed textual history and description of the building. TxDOT will also conduct a comprehensive survey of similar early and mid-twentieth-century warehouses in the East Downtown (EaDo) area, in an effort to identify relevant property types, evaluate relative significance of individual properties, and provide information to facilitate future planning decisions relating to historic properties in the area. The mitigation documents will be available to the public online and at local repositories such as the City of Houston's Historic Preservation Office and the Julia Ideson Historic Library.

8.3 Readers Distributors Warehouse

TxDOT coordinated with SHPO, ACHP, and consulting parties regarding potential mitigation measures to compensate for impacts of the NHHIP to the Readers Distributors Warehouse, as well as to other historic properties. TxDOT will document the Readers Warehouse to Historic American Building Survey (HABS) Level I/Level II standards, with large-format photography, measured drawings of the building or full-size Mylar copies of as-built building plans, and a detailed textual history and description of the building. TxDOT will also conduct a comprehensive survey of similar early and mid-twentieth-century warehouses in the East Downtown (EaDo) area, in an effort to identify relevant property types, evaluate relative significance of individual properties, and provide information to facilitate future planning decisions relating to historic properties in the area. The mitigation documents will be available to the public online and at local repositories such as the City of Houston's Historic Preservation Office and the Julia Ideson Historic Library.

8.4 Cheek-Neal Coffee Company Building

TxDOT coordinated with SHPO, ACHP, and consulting parties regarding mitigation measures to compensate for impacts of the NHHIP to the Cheek-Neal property, as well as to other historic properties. TxDOT will conduct a comprehensive survey of similar early and mid-twentieth-century warehouses in the East Downtown (EaDo) area, in an effort to identify relevant property types, evaluate relative significance of individual properties, and provide information to facilitate future planning decisions relating to historic properties in the area. The design build contractor will be monitored during construction by inspection staff. If vibration exceeds certain levels, the contractor must develop other construction methods in proximity to the historic property. Those methods are to be approved by TxDOT historians, SHPO and ACHP. No work may take place in the affected vicinity of property until adverse vibration effects are resolved. The mitigation documents will be available to the public online and at local repositories such as the City of Houston's Historic Preservation Office and the Julia Ideson Historic Library.

8.5 Rossonian Cleaners

TxDOT coordinated with SHPO, ACHP, and consulting parties regarding mitigation measures to compensate for impacts of the NHHIP to the Rossonian Cleaners, as well as to other historic properties. TxDOT will complete archival documentation of the Rossonian Cleaners prior to its demolition, to include a history of the property and the Almeda Road commercial area. TxDOT will document the Rossonian Cleaners to Historic American Building Survey (HABS) Level I/Level II standards, with large-format photography, measured drawings of the building or full-size Mylar copies of as-built building

plans, and a detailed textual history and description of the building. The mitigation documents will be available to the public online and at local repositories such as the City of Houston's Historic Preservation Office and the Julia Ideson Historic Library.

9 COORDINATION

TxDOT coordinated with the ACHP and consulting parties as part of the Section 106 process and with SHPO as the Official with Jurisdiction (OWJ) for historic sites under Section 4(f). The SHPO has no comment on the Section 4(f) document as the OWJ. The SHPO, ACHP, and consulting parties concurred with TxDOT's determination that the project would have an adverse effect to:

- Houston Warehouse Historic District
- Carlisle Plastics North Warehouse
- Readers Distributors Warehouse
- Cheek-Neal Coffee Company Building and associated property parcel
- Rossonian Cleaners

The SHPO, ACHP, and consulting parties had no comment on TxDOT's determination that the project would have a *de minimis* impact, and concurred that there would be no adverse effect, to:

- Near Northside Historic District
- Residential Property's non-contributing garage at 109 Carl St. (within Near Northside Historic District)
- San Jacinto Warehouse (within Near Northside Historic District)
- Walters's Downtown/Former Bottling Works (within Near Northside Historic District)
- METRO Transit Building (within Near Northside Historic District)
- Houston Downtown Post Office

The ACHP is participating as a consulting party to the Section 106 agreement process. TxDOT developed a Programmatic Agreement (PA) that identifies historic properties adversely affected by the NHHIP, stipulates TxDOT's mitigation commitments, and specifies procedures and processes to be implemented during the design-build process to avoid and minimize harm to historic properties. TxDOT consulted with ACHP, SHPO, and other consulting parties in the development and execution of the PA. The SHPO and the ACHP concurrences on determinations of eligibility and effect for this project, as well as the proposed mitigation process are embedded in this PA, which is in Appendix R of the Final EIS.

Additional information regarding coordination with additional groups and individuals who have requested status as consulting parties under Section 106 is described in the September 2019 Historic Resources Survey Report Update prepared for the NHHIP. Additional information regarding overall public outreach and involvement for the NHHIP is included in the project's Final EIS.

Coordination with SHPO, ACHP and consulting parties is ongoing to identify additional mitigation options and to ensure that the project construction will avoid adverse effects to historic properties as it moves through the design-build process.

10 CONCLUSION

Based on the above considerations, there is not a feasible and prudent alternative to the use of five Section 4(f) properties (Houston Warehouse Historic District, Readers Distributors Warehouse, Carlisle Plastics, Cheek Neal Coffee Company Building, and Rossonian Cleaners) and the proposed action includes all possible planning to minimize and mitigate harm to the Section 4(f) properties resulting from the use.

11 REFERENCES

Texas Historical Commission (THC). 2018. Letter from Justin Kockritz, THC to Renee Benn, TxDOT. Project Review Under Section 106 of the National Historic Preservation Act., North Houston Highway Improvement Project, Determination of Eligibility and Findings of Effect, Houston, Harris County (TxDOT/106, THC #201900856, CSJ 0912-00-146). November 2, 2018.

Texas Historical Commission (THC). 2019. Letter from Justin Kockritz, THC to Renee Benn, TxDOT. Project Review Under Section 106 of the National Historic Preservation Act, North Houston Highway Improvement Project, Historic Resources Survey Report- Update, Determinations of Eligibility and Assessment of Effects, Houston, Harris County (TxDOT/106, THC #201912479, CSJ 0912-00-146). September 9, 2019.

Texas Department of Transportation (TxDOT). 2020. Letter from Renee Benn, TxDOT to Justin Kockritz, Texas Historical Commission. Section 106 Review: Determination of NRHP Effects, Section 4(f) Review: Notification of Intent to Render De Minimis Section 4(f) Finding, Individual Section 4(f) Finding. February 7, 2020.

Attachment A. Layouts and Typical Sections of Reasonable Alternatives and Proposed Action



Segment 3/Alternative 10, showing downtown loop area. Proposed ROW acquisition shown in yellow.

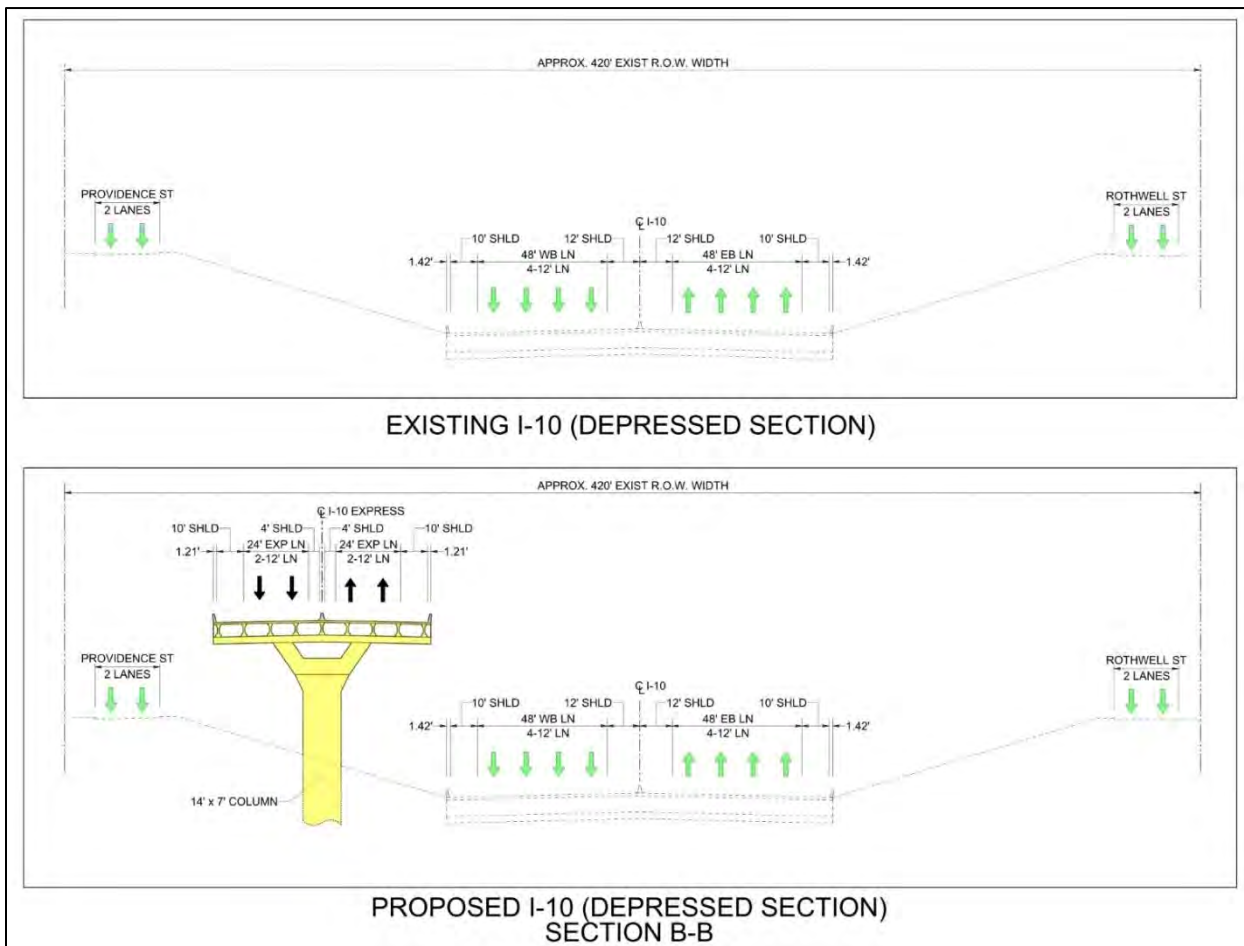


Segment 3/Alternative 10, showing Houston Warehouse Historic District area.
Proposed ROW acquisition in yellow.



I-45 NORTH - SEGMENT 3 (ALT 10)

PRELIMINARY SUBJECT TO CHANGE



Segment 3/Alternative 10 showing existing and proposed IH 10 section at Chapman Street.

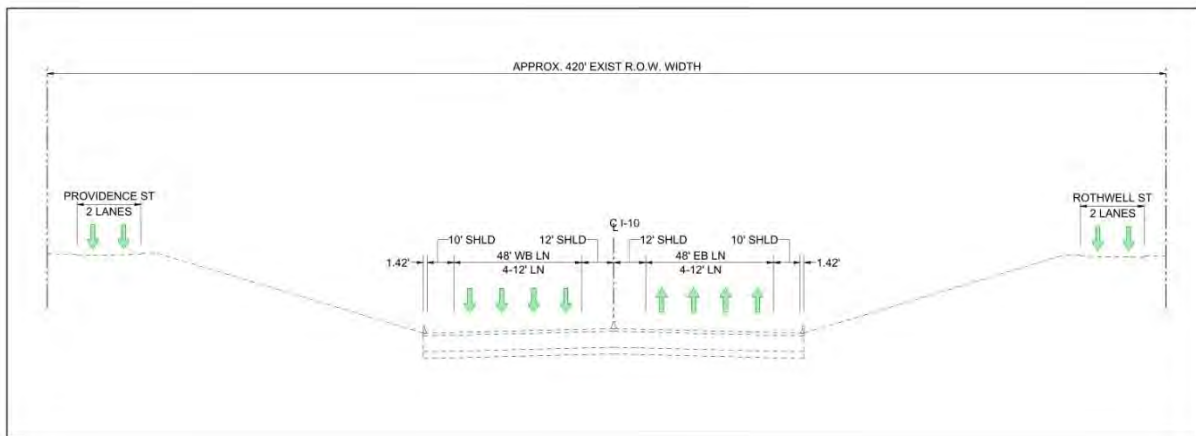


Segment 3/original Alternative 11, showing downtown loop area.
Proposed ROW acquisition shown in yellow.

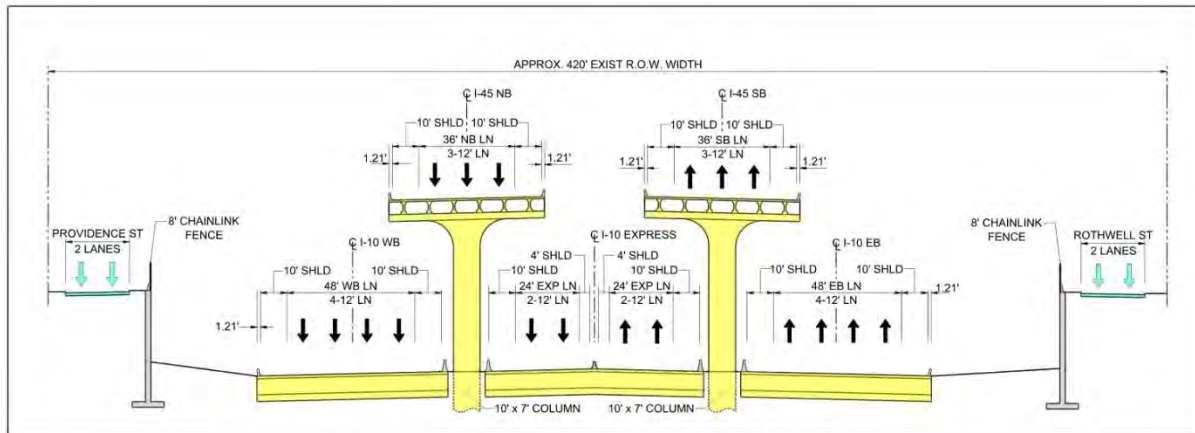


I-45 NORTH - SEGMENT 3 (ALT 11)

PRELIMINARY SUBJECT TO CHANGE

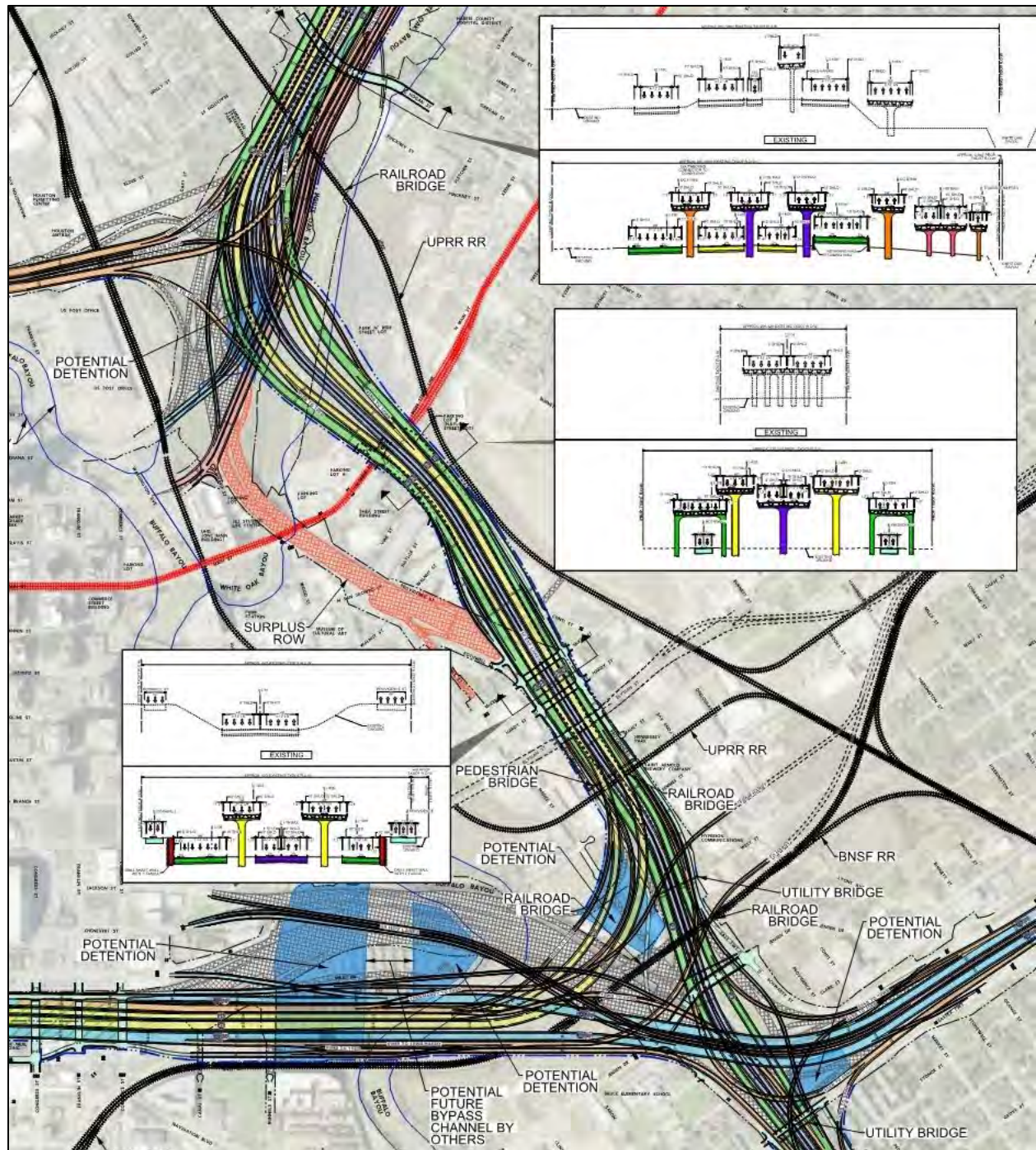


EXISTING I-10 (DEPRESSED SECTION)

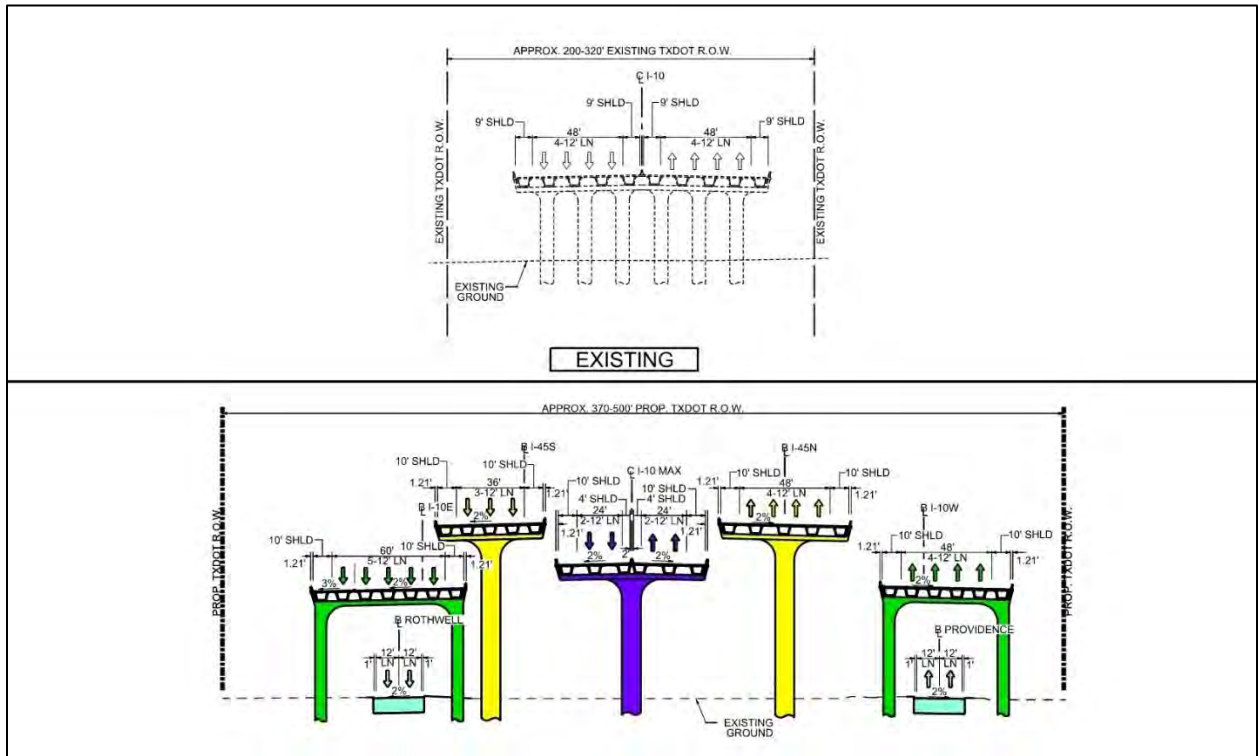


PROPOSED I-10 (DEPRESSED SECTION)
SECTION A-A

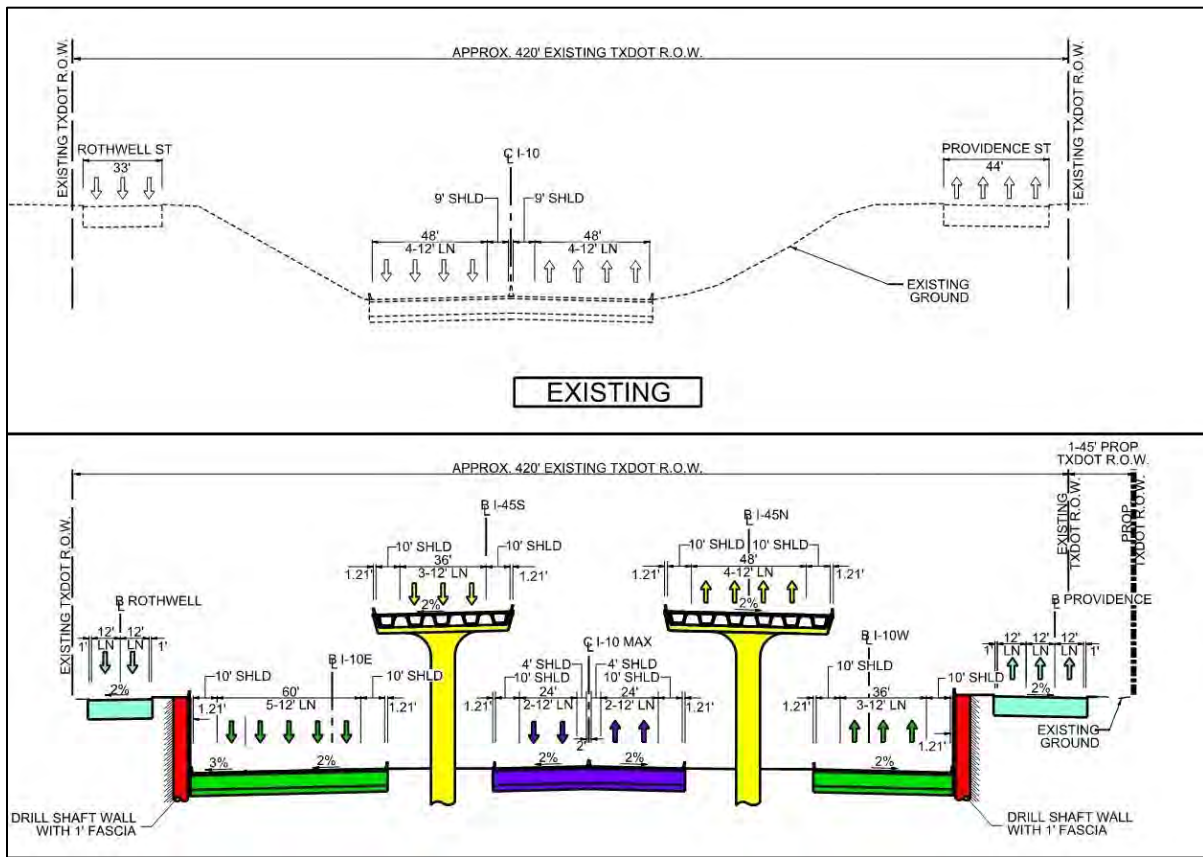
Segment 3/original Alternative 11 showing existing IH 10 and proposed IH 45/IH 10 section at Elysian Street.



Segment 3/modified Alternative 11 (Proposed Action), showing Houston Warehouse Historic District area.



Segment 3/Modified Alternative 11 (Proposed Action), showing existing IH 10 and proposed IH 45/IH 10 section at Vine Street.



Segment 3/Modified Alternative 11 (Proposed Action), showing existing IH 10 and proposed IH 45/IH 10 section at McKee Street.



Segment 3/Alternative 12, showing downtown loop area. Proposed ROW acquisition shown in yellow.

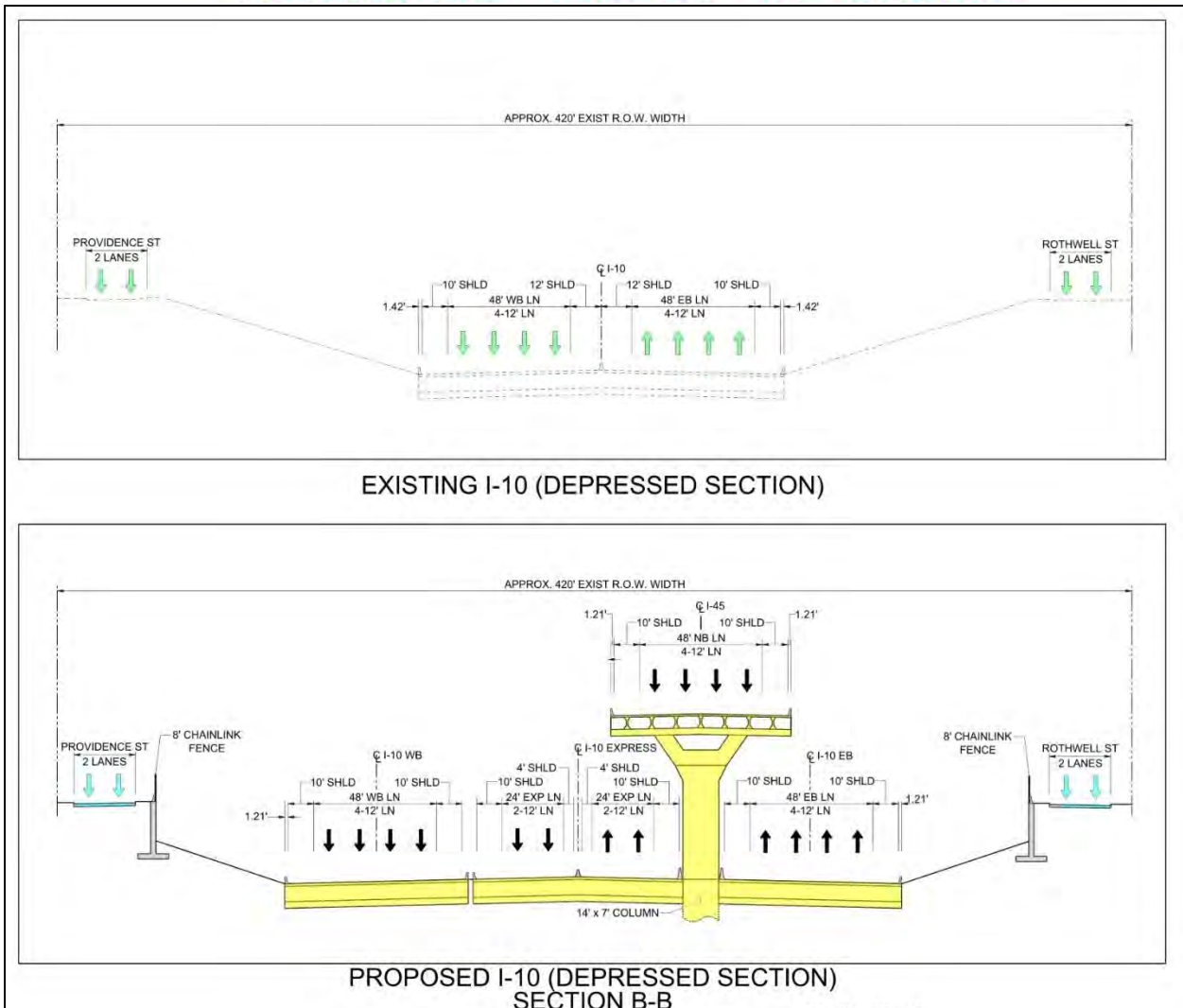


Segment 3/Alternative 12, showing Houston Warehouse Historic District area.
Proposed ROW acquisition in yellow.



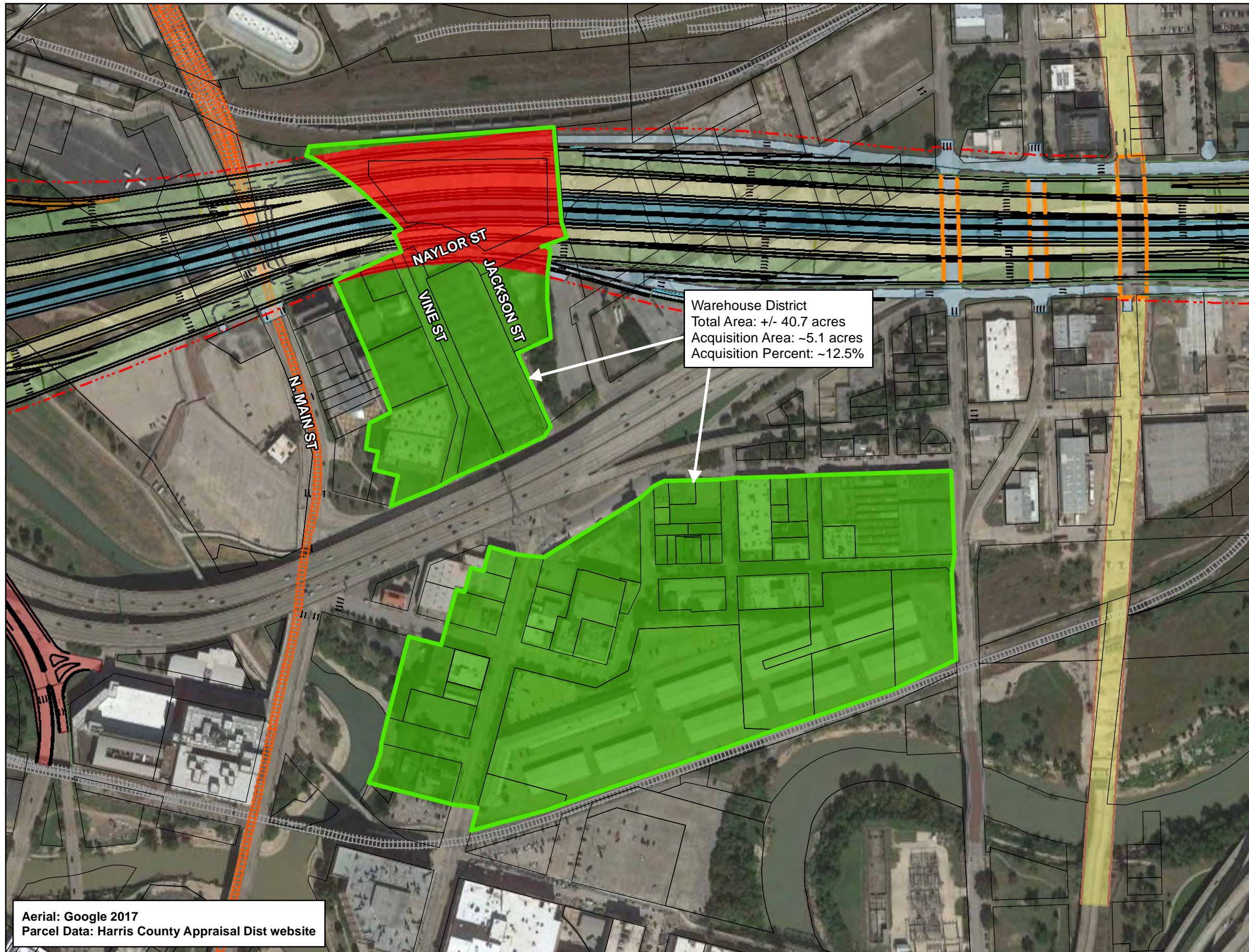
I-45 NORTH - SEGMENT 3 (ALT 12)

PRELIMINARY SUBJECT TO CHANGE

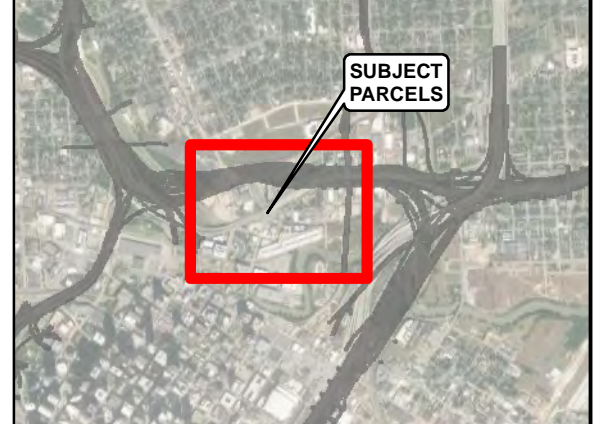
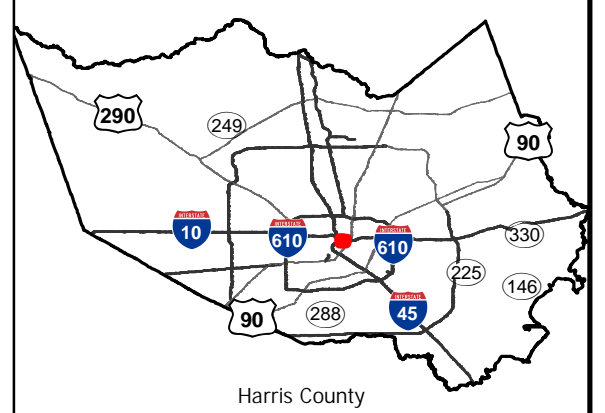
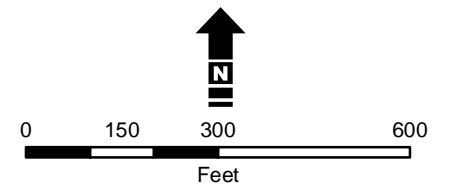


Segment 3/Alternative 12 showing existing IH 10 and proposed IH 45 NB/IH 10 section at Elysian Street.

Attachment B. Maps



Aerial: Google 2017
Parcel Data: Harris County Appraisal Dist website



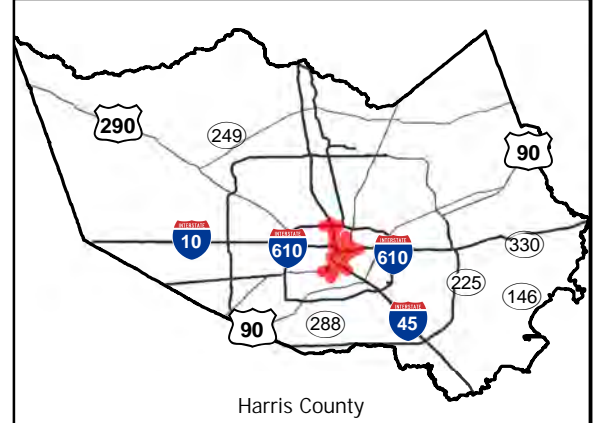
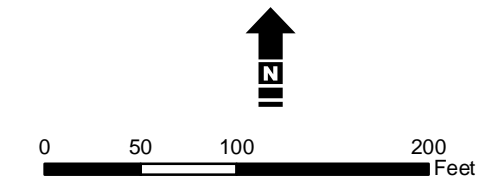
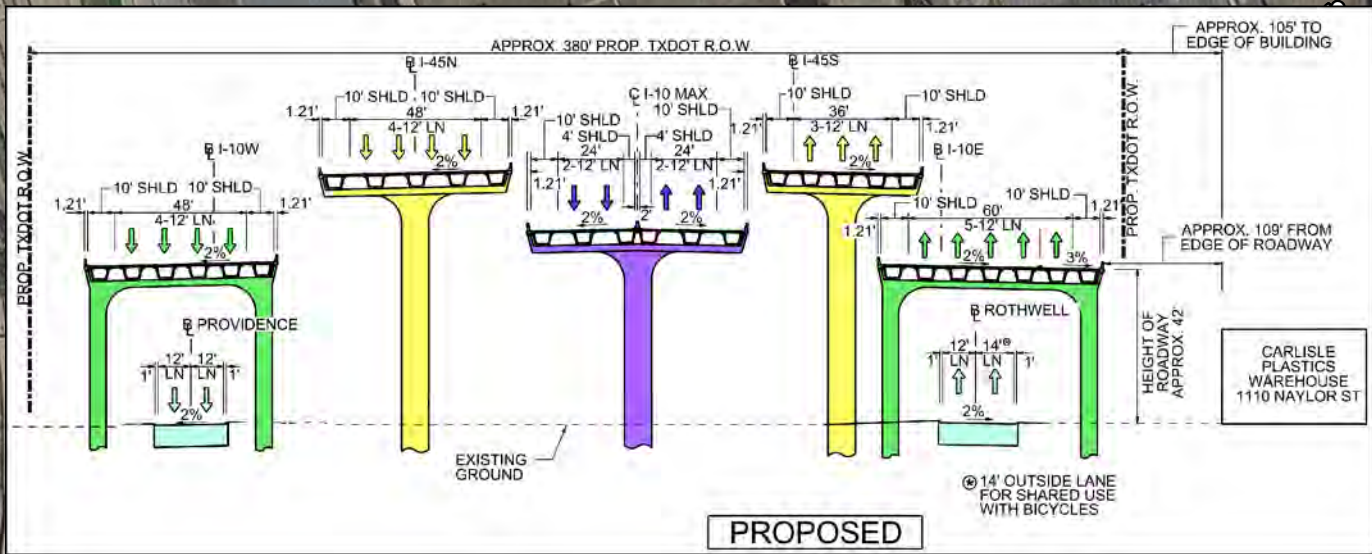
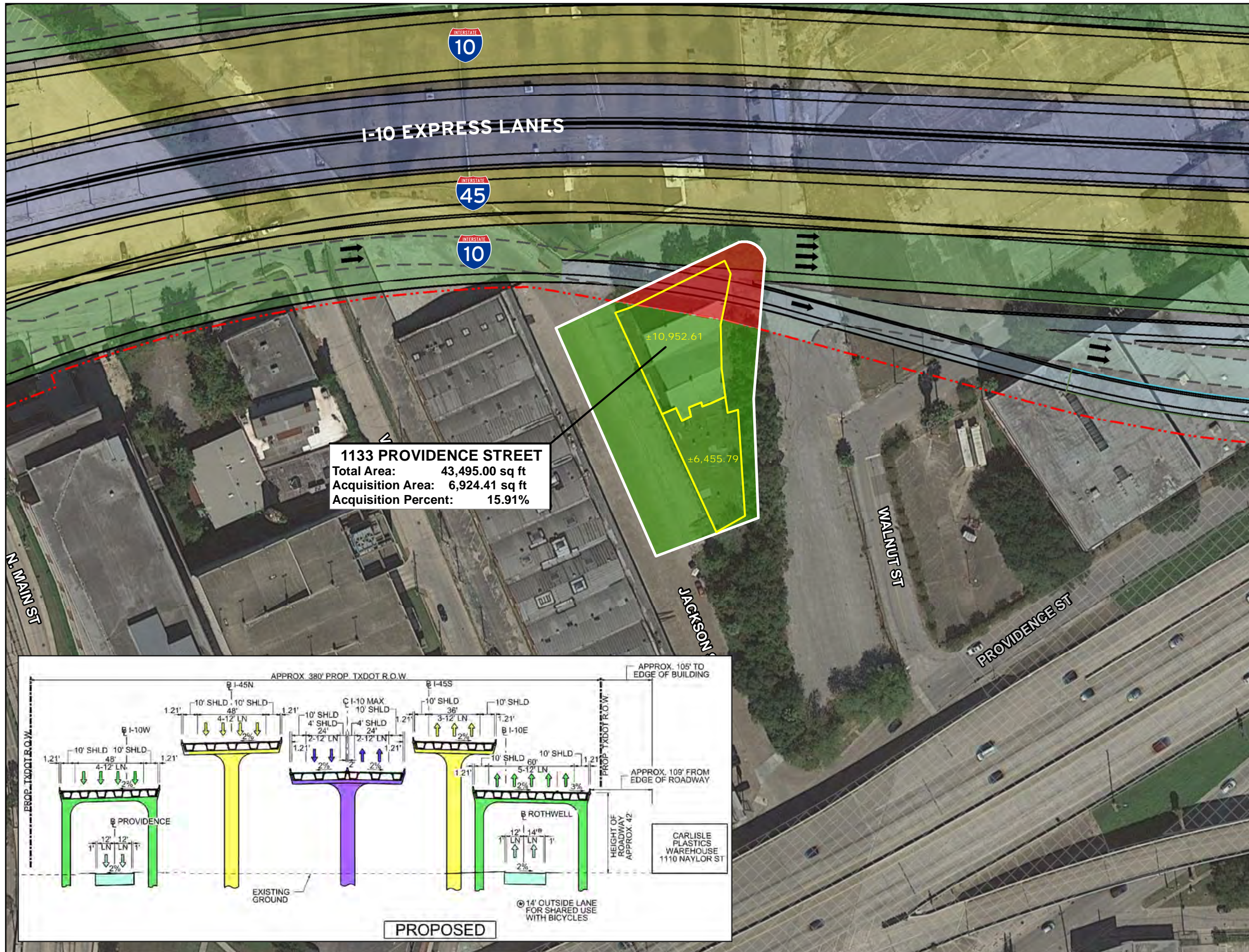
LEGEND

Warehouse District	Express Lanes
Proposed	Bridge-Conc-Local Streets
Remainder	Bridge-Conc_HWY_IH45
Proposed Right-of-Way	DC_I10E-US59S
Metro Rail	DC_US59N-I10W
Railroad	HWY_Future Elysian
Access Road / Ramp	IH-45 MaX Lanes
Bridge DC/Ramp	IH-10
	IH-45

**North Houston Highway Improvement Project (NHHIP)
Warehouse District**



Date Saved: 9/21/2018



LEGEND

	Proposed Right-of-Way		Entrance / Exit Ramp
	ACQUIRED		I-10 Mainlanes
	REMAINDER		I-45 Mainlanes
	Frontage Rd / Cross St		Removals
	I-10 Max Lanes		Building Outline

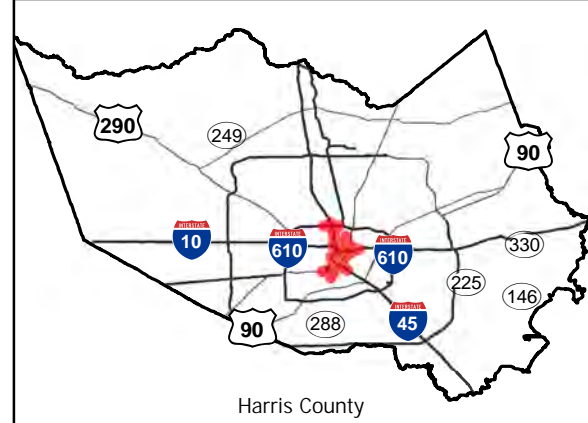
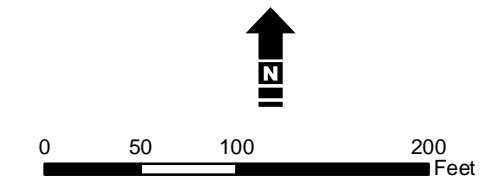
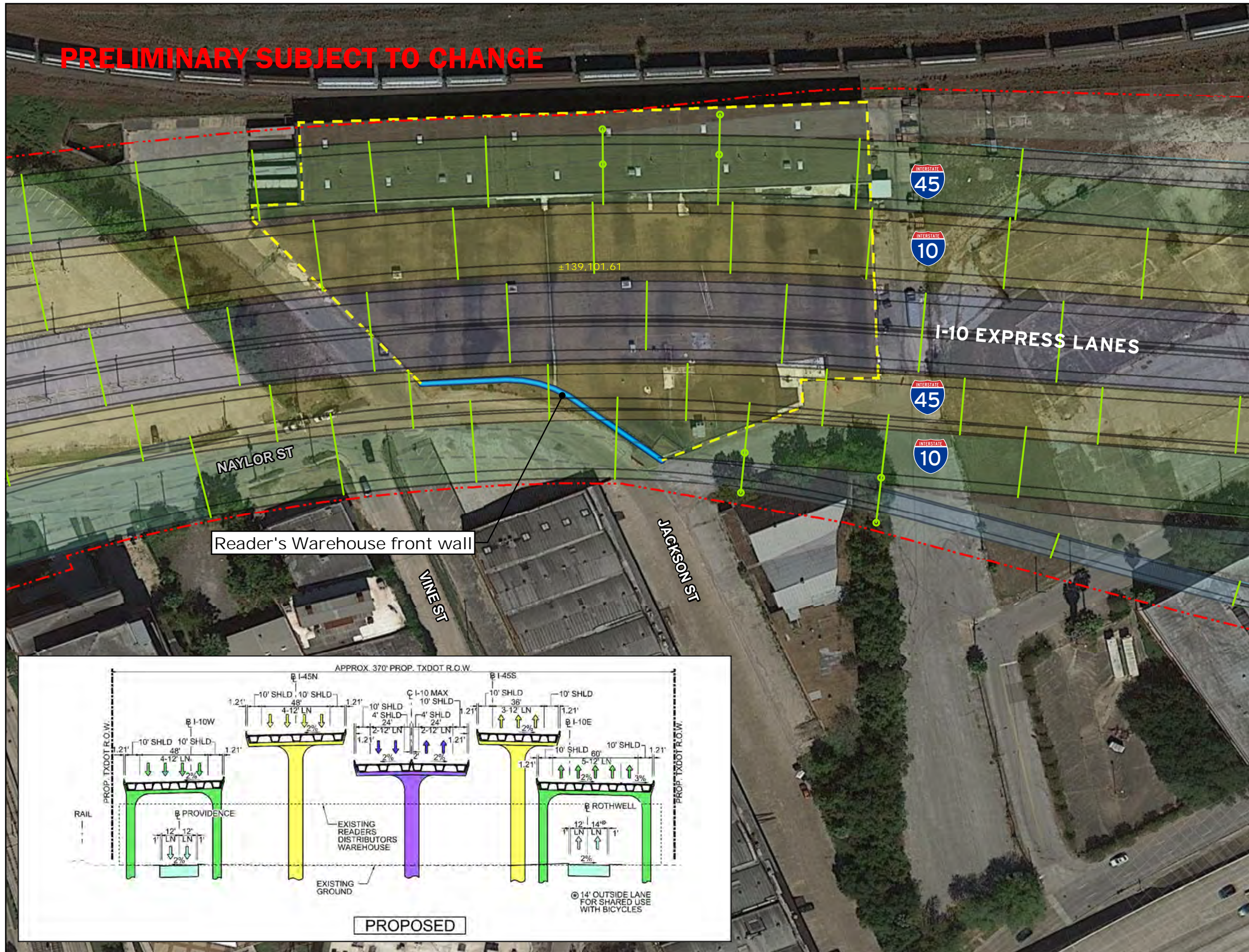
North Houston Highway Improvement Project

CARLISLE WAREHOUSE
 1133 Providence Street
Proposed Parcel Acquisition
 NHHIP SEGMENT 3 I-45



Date Saved: 2/15/2018

PRELIMINARY SUBJECT TO CHANGE



LEGEND

Proposed Right-of-Way	Frontage Rd / Cross St
Bridge Bents	I-10 Max Lanes
Warehouse Front Wall	Entrance / Exit Ramp
Warehouse Other Walls	I-10 Mainlanes
Concrete Bent	I-45 Mainlanes
Steel Bent	Removals
Steel Span	

North Houston Highway Improvement Project

**READER'S WAREHOUSE
1201 Naylor Street**

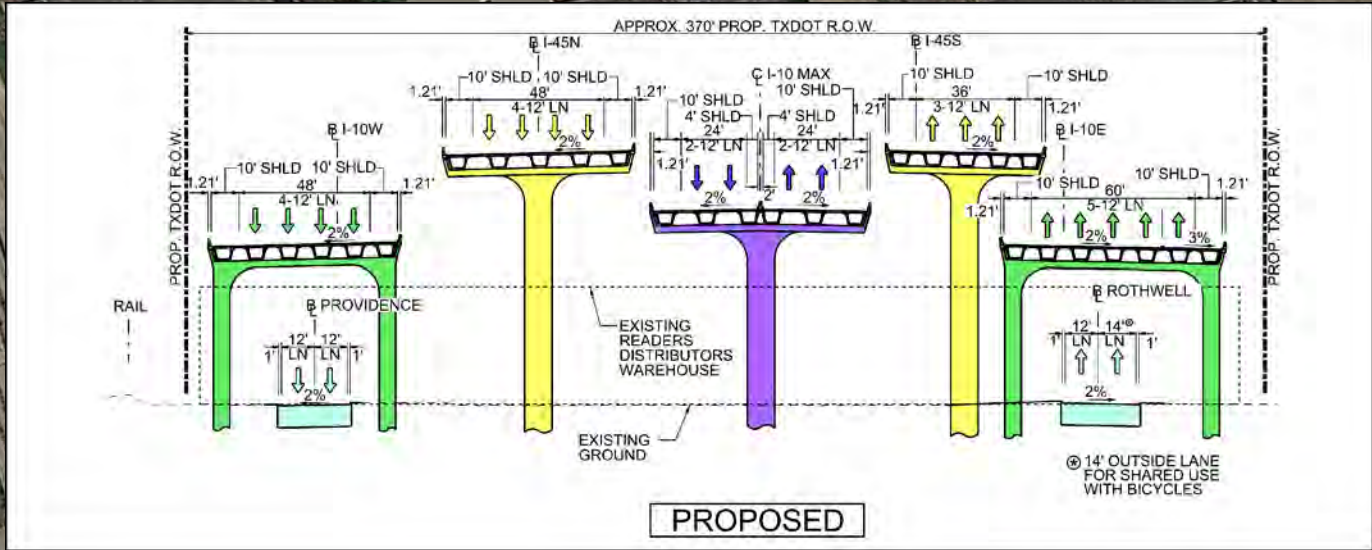
Preliminary Bridge Bent Locations

NHHIP SEGMENT 3 I-45

PRELIMINARY SUBJECT TO CHANGE







Date Saved: 2/15/2018

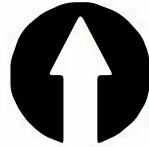


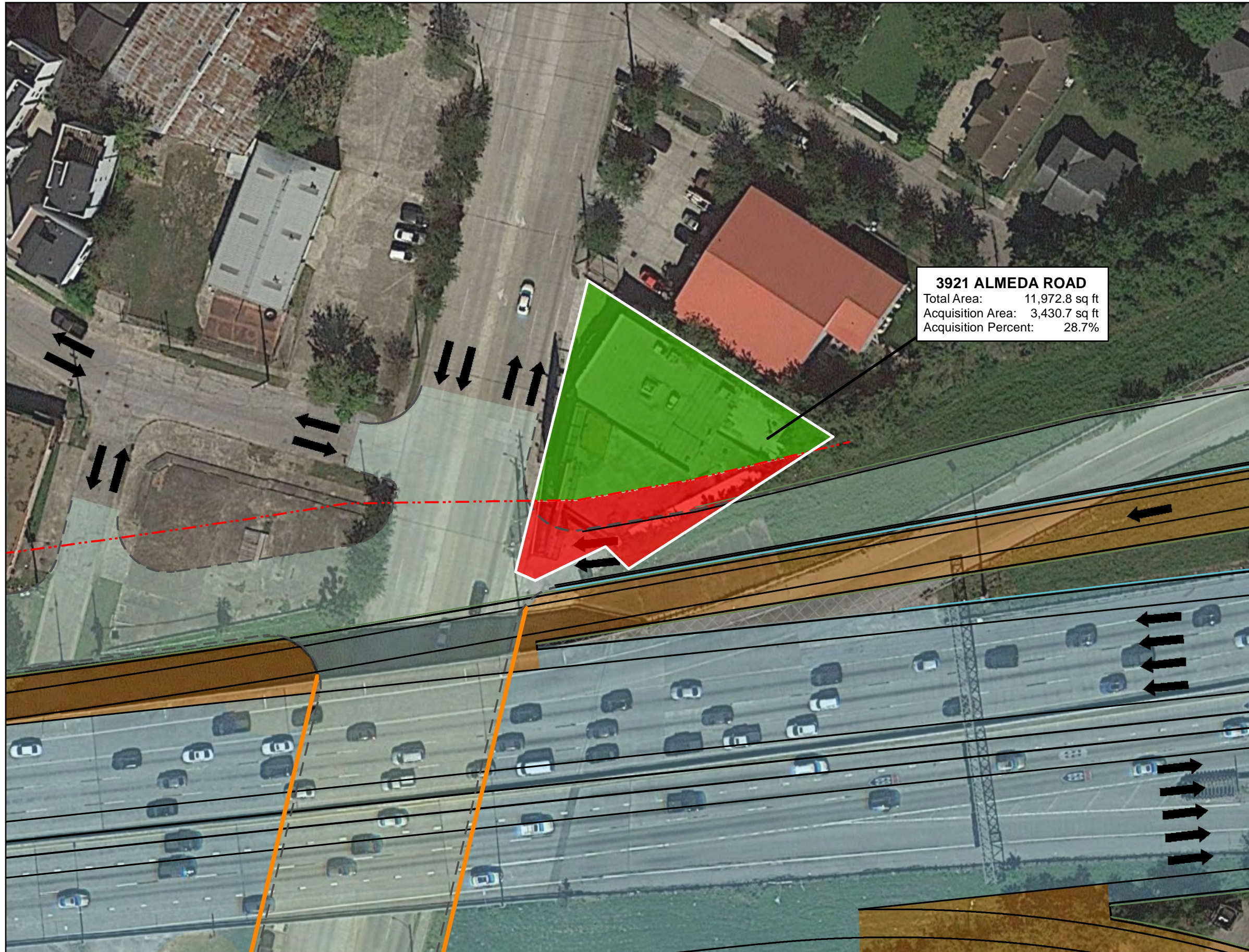


Legend

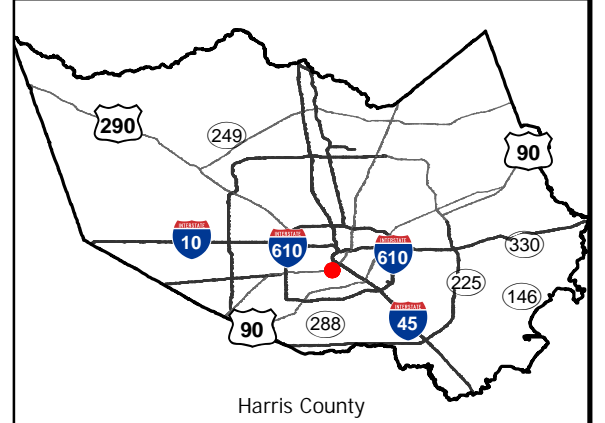
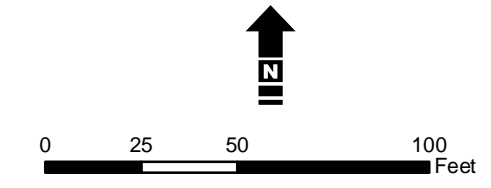
-  Area of Potential Effect
-  Eligible/Listed
-  Proposed ROW
-  Existing ROW

0 50 100 150 200 Feet





3921 ALMEDA ROAD
 Total Area: 11,972.8 sq ft
 Acquisition Area: 3,430.7 sq ft
 Acquisition Percent: 28.7%



LEGEND

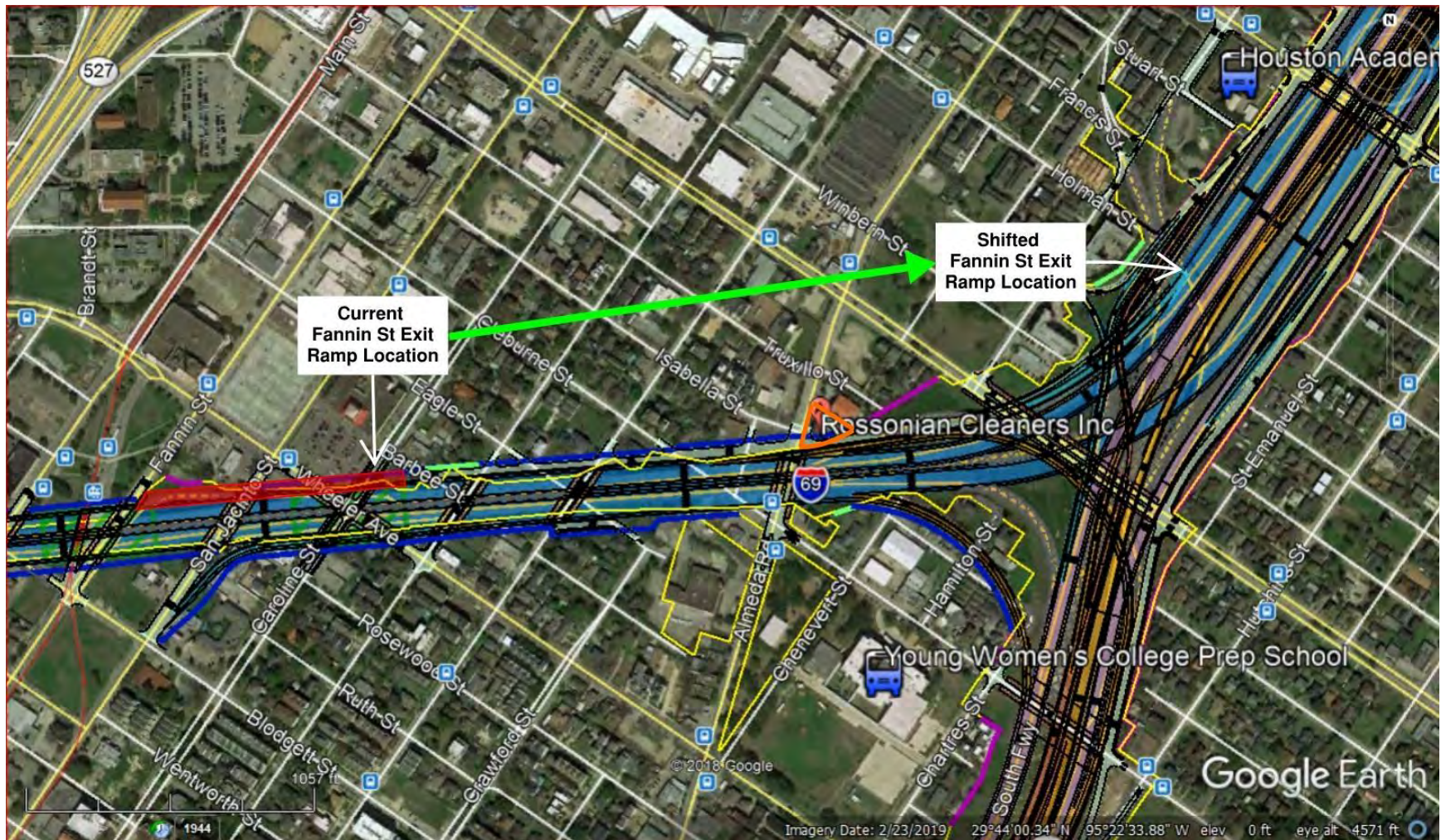
- - - Proposed Right-of-Way
- Proposed Acquisition
- Remaining Parcel
- Frontage Rd / Cross St
- Direct Connector
- I-69/US 59 Mainlanes
- Removals

North Houston Highway Improvement Project

Rossonian Cleaners
3921 Alameda Road
Proposed Parcel Acquisition
 NHHIP SEGMENT 3 I-45



Date Saved: 9/13/2018



Map showing current and proposed IH 69 exit ramps to Fannin Street and proposed IH 69/SH 288 interchange. Existing ROW outlined in yellow and proposed ROW outlined in blue. Rossonian Cleaners property is outlined in orange at right center of image.

Attachment C. Photographs



View facing southeast, showing Carlisle Plastic North Warehouse.



View facing south, showing north side of Carlisle Plastics North Warehouse.



View facing northeast, showing connection between Carlisle Plastic North Warehouse and South Warehouse.



View facing southeast, showing north side of Carlisle Plastics South Warehouse.



View facing northeast, showing Carlisle Plastic South Warehouse. North warehouse in left background.



View facing north-northwest, showing Carlisle Plastics North Warehouse, adjoining parking area, Jackson Street and nearby historic properties (San Jacinto Warehouse at left, Readers Warehouse at center background).



Birds-eye view of Readers Warehouse facing north. Image courtesy Google.



View facing north, showing Readers Warehouse main entry and exterior near office/showroom area.



View facing north-northwest, showing loading docks on southeast corner of Readers Warehouse.
Note 1998 rear addition in background of frame.



View facing southeast, showing contributing resources in 1200 block Nance Street (left to right: Fifth Ward Hotel, Tony's Barber Shop, Henke's Grocery).



View facing east at intersection of Rothwell Street, Walnut Street, and Nance Street. Existing IH 10 at left of frame.



View facing southwest, showing north portion of San Jacinto Warehouses at 1125 Providence Street.



View facing west along Providence Street, showing existing IH 10 at left and San Jacinto Warehouses on right.



View facing southwest, showing Gulf Coast Implement Company at 1021 N. San Jacinto St.



View facing northwest, showing Gulf Coast Implement Company at 1021 N. San Jacinto St.



View facing west-northwest, showing Heflin Rubber property (2 buildings) at 1001 N. San Jacinto St.



View facing northwest, showing Union Transfer Company warehouse at 1113 Vine St.



Cheek-Neal Coffee Company Building
View facing north from Preston Street/St. Emanuel Street intersection.



View facing south.



View facing south-southwest, showing relationship of building to parking area and existing IH 69.



View facing south-southwest. Area of proposed IH 45/IH 69 at center and right of frame. Left orange cone at proposed ROW line, right orange cone at edge of proposed retaining wall for depressed freeway.



View facing east-northeast, showing 1928 portion of Rossonian Cleaners building.



View facing northeast, showing west and south sides of Rossonian Cleaners building.



View facing northeast, showing Rossonian Cleaners building and adjacent parking.



View facing north from IH 69 ROW, showing rear of Rossonian Cleaners building.



View facing east-northeast, showing existing northbound SH 288-to-southbound IH 69 ramp at right and east edge of Rossonian Cleaners property at left.

Attachment D. Reasonable Alternatives Matrix – Section 4(f) Uses in Houston Warehouse Historic District

Property Name/Address	NRHP eligibility	Proposed Action (modified Alternative 11)	Alternative 10	Original Alternative 11	Alternative 12
Houston Warehouse Historic District (NRHP-eligible)	NRHP-eligible	Use: Permanent incorporation of 5.1 acres from district.	Use: Permanent incorporation of 0.5 acres from district.	Use: Permanent incorporation of 2.21 acres from district.	Use: Permanent incorporation of 0.49 acres from district.
		Section 106: Adverse effect.	Section 106: Adverse effect.	Section 106: Adverse effect.	Section 106: Adverse effect.
		Section 4(f): Greater than de minimis impact.	Section 4(f): Greater than de minimis impact.	Section 4(f): Greater than de minimis impact.	Section 4(f): Greater than de minimis impact.
Union Transfer Company warehouse (1133 Vine Street)	Individually NRHP-listed; contributing to historic district	Use: No use.	Use: Use of paved parking area.	Use: Demolition of building.	Use: Use of paved parking area.
		Section 106: Outside Area of Potential Effect.	Section 106: Likely no adverse effect.	Section 106: Adverse effect.	Section 106: Likely no adverse effect.
		Section 4(f): Not applicable.	Section 4(f): Likely de minimis impact.	Section 4(f): Greater than de minimis impact.	Section 4(f): Likely de minimis impact.
Readers Distributors Warehouse (1201 Naylor Street)	Individually NRHP-eligible; contributing to historic district	Use: Permanent incorporation of entire parcel; demolition of building.	Use: No use.	Use: No use.	Use: No use.
		Section 106: Adverse effect.	Section 106: Outside Area of Potential Effect.	Section 106: Outside Area of Potential Effect.	Section 106: Outside Area of Potential Effect.
		Section 4(f): Greater than de minimis impact.	Section 4(f): Not applicable.	Section 4(f): Not applicable.	Section 4(f): Not applicable.
Carlisle Plastics Warehouses (1133 Providence Street)	NRHP-eligible (contributing resource to historic district)	Use: Permanent incorporation of 0.16 acre (15.91% of parcel); demolition of North Warehouse.	Use: No use.	Use: No use.	Use: No use.
		Section 106: Adverse effect (North Warehouse); no adverse effect (South Warehouse).	Section 106: No adverse effect.	Section 106: No adverse effect.	Section 106: No adverse effect.
		Section 4(f): Greater than de minimis impact.	Section 4(f): Not applicable.	Section 4(f): Not applicable.	Section 4(f): Not applicable.
Former Bottling Works (1120 Naylor Street)	NRHP-eligible (contributing resource to historic district)	Use: Permanent incorporation of paved parking area (27.62% of parcel).	Use: No use.	Use: No use.	Use: No use.
		Section 106: No adverse effect.	Section 106: Outside Area of Potential Effect.	Section 106: Outside Area of Potential Effect.	Section 106: Outside Area of Potential Effect.
		Section 4(f): De minimis impact.	Section 4(f): Not applicable.	Section 4(f): Not applicable.	Section 4(f): Not applicable.

Property Name/Address	NRHP eligibility	Proposed Action (modified Alternative 11)	Alternative 10	Original Alternative 11	Alternative 12
METRO Warehouse (1116 Naylor Street)	NRHP-eligible (contributing resource to historic district)	Use: Permanent incorporation of 0.024 acre of driveway (3.5% of parcel).	Use: No use.	Use: No use.	Use: No use.
		Section 106: No adverse effect.	Section 106: Outside Area of Potential Effect.	Section 106: Likely no adverse effect.	Section 106: Outside Area of Potential Effect.
		Section 4(f): De minimis impact.	Section 4(f): Not applicable.	Section 4(f): Not applicable.	Section 4(f): Not applicable.
San Jacinto Warehouses (1125 Providence Street)	NRHP-eligible (contributing resource to historic district)	Use: Permanent incorporation of 88.23 square feet (0.01% of parcel).	Use: Demolition of portions of building.	Use: Demolition of major portions of building.	Use: Demolition of portions of building.
		Section 106: No adverse effect.	Section 106: Adverse effect.	Section 106: Adverse effect.	Section 106: Adverse effect.
		Section 4(f): De minimis impact.	Section 4(f): Greater than de minimis impact.	Section 4(f): Greater than de minimis impact.	Section 4(f): Greater than de minimis impact.
Gulf Coast Implement Company (1021 N. San Jacinto St)	NRHP-eligible (contributing resource to historic district)	Use: No use.	Use: No use.	Use: Demolition of building.	Use: Demolition of building.
		Section 106: Outside Area of Potential Effect.	Section 106: Likely no adverse effect.	Section 106: Adverse effect.	Section 106: Adverse effect.
		Section 4(f): Not applicable.	Section 4(f): Not applicable.	Section 4(f): Greater than de minimis impact.	Section 4(f): Greater than de minimis impact.
Henke's Fifth Ward Grocery (1200 Nance Street)	NRHP-eligible (contributing resource to historic district)	Use: No use.	Use: No use.	Use: Demolition of building.	Use: No use.
		Section 106: Outside Area of Potential Effect.	Section 106: Likely no adverse effect.	Section 106: Adverse effect.	Section 106: Likely no adverse effect.
		Section 4(f): Not applicable.	Section 4(f): Not applicable.	Section 4(f): Greater than de minimis impact.	Section 4(f): Not applicable.
Tony's Barber Shop (1204 Nance Street)	NRHP-eligible (contributing resource to historic district)	Use: No use.	Use: No use.	Use: Demolition of building.	Use: No use.
		Section 106: Outside Area of Potential Effect.	Section 106: Likely no adverse effect.	Section 106: Adverse effect.	Section 106: Likely no adverse effect.
		Section 4(f): Not applicable.	Section 4(f): Not applicable.	Section 4(f): Greater than de minimis impact.	Section 4(f): Not applicable.
Fifth Ward Hotel (1206 Nance Street)	NRHP-eligible (contributing resource to historic district)	Use: No use.	Use: No use.	Use: Demolition of building.	Use: No use.
		Section 106: Outside Area of Potential Effect.	Section 106: Likely no adverse effect.	Section 106: Adverse effect.	Section 106: Likely no adverse effect.
		Section 4(f): Not applicable.	Section 4(f): Not applicable.	Section 4(f): Greater than de minimis impact.	Section 4(f): Not applicable.

Attachment E. Maps and Typical Sections of the Avoidance Alternatives

IH 45 NORTH - UNIVERSE OF ALTERNATIVES

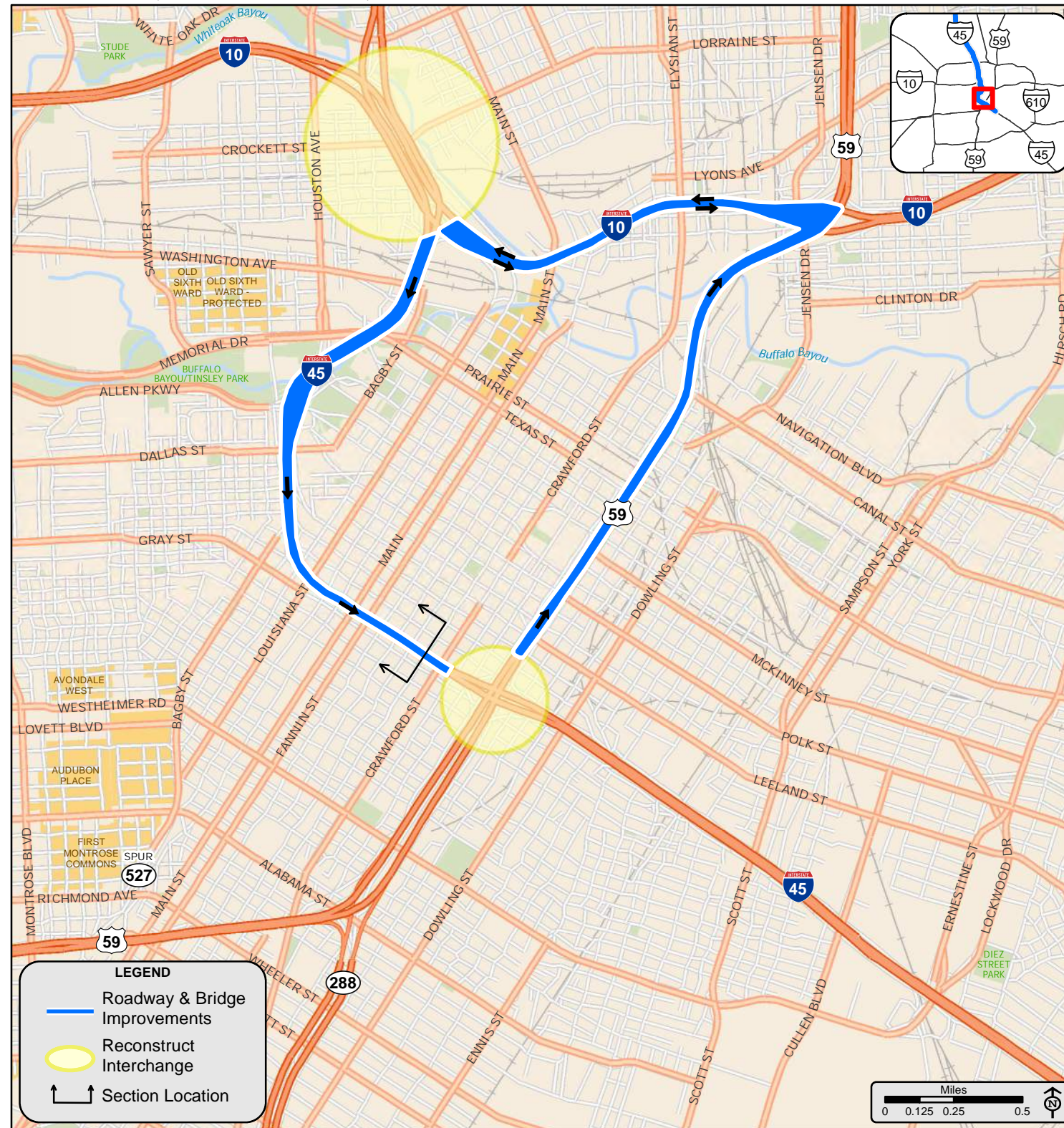
PRELIMINARY: SUBJECT TO CHANGE

SEGMENT 3

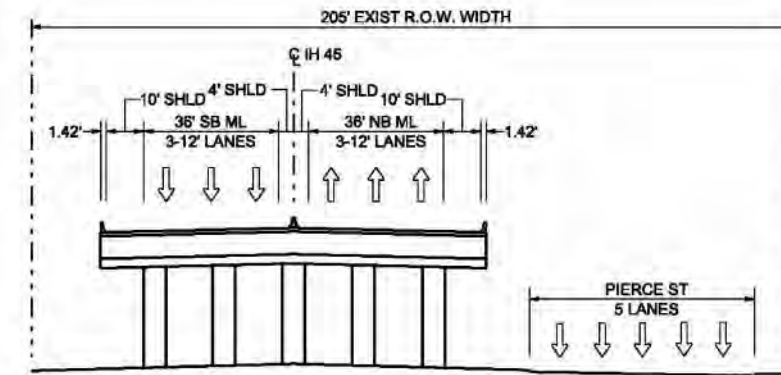
LIMITS: IH 10 TO IH 45/US 59 INTERCHANGE

LENGTH: 2.8 MILES

ESTIMATED COST (CONSTRUCTION & DESIGN):

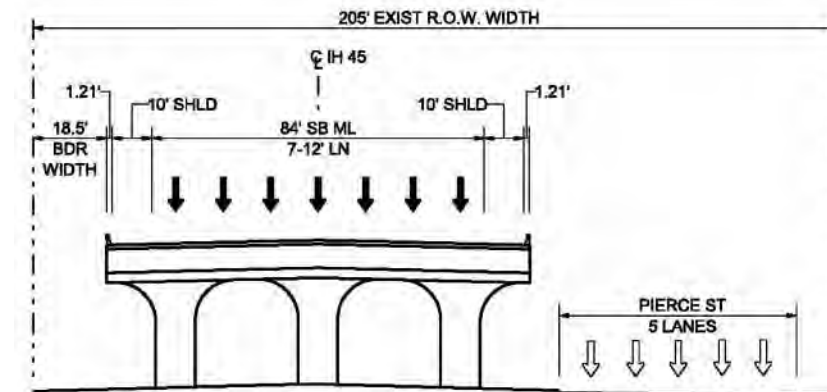


EXISTING TYPICAL SECTION - IH 45



SELECTED AS PRELIMINARY ALTERNATIVE

PROPOSED TYPICAL SECTION - IH 45 (ALTERNATIVE 3)



IH 45 NORTH HOUSTON HIGHWAY IMPROVEMENT PROJECT

HARRIS COUNTY



IH 45 NORTH - UNIVERSE OF ALTERNATIVES

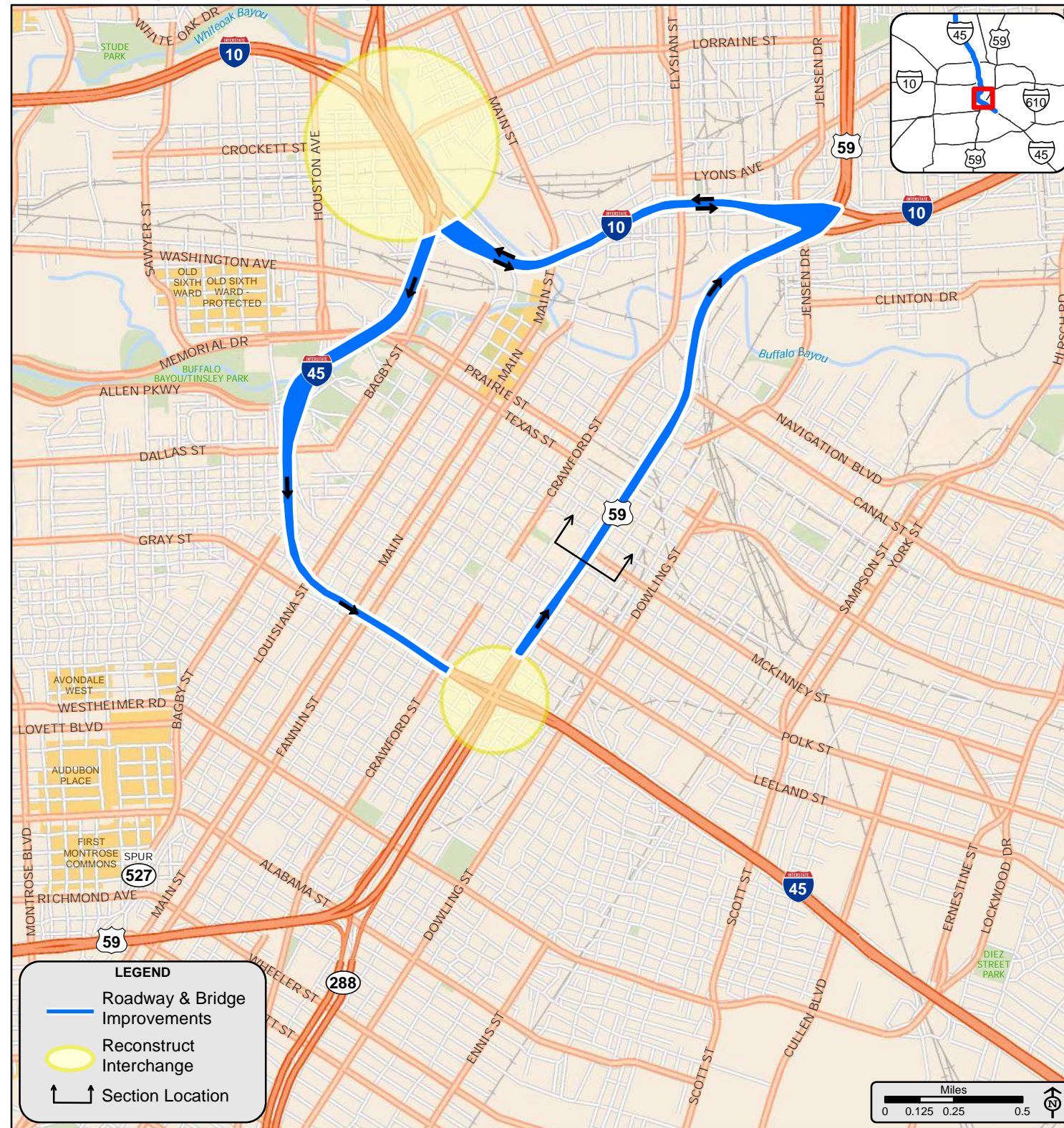
PRELIMINARY: SUBJECT TO CHANGE

SEGMENT 3

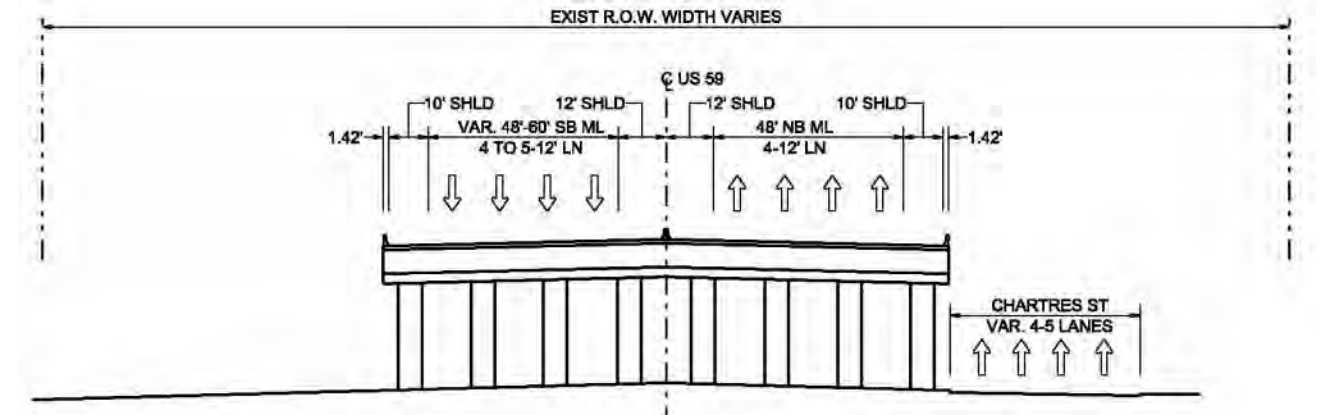
LIMITS: IH 10 TO IH 45/US 59 INTERCHANGE

LENGTH: 2.8 MILES

ESTIMATED COST (CONSTRUCTION & DESIGN):

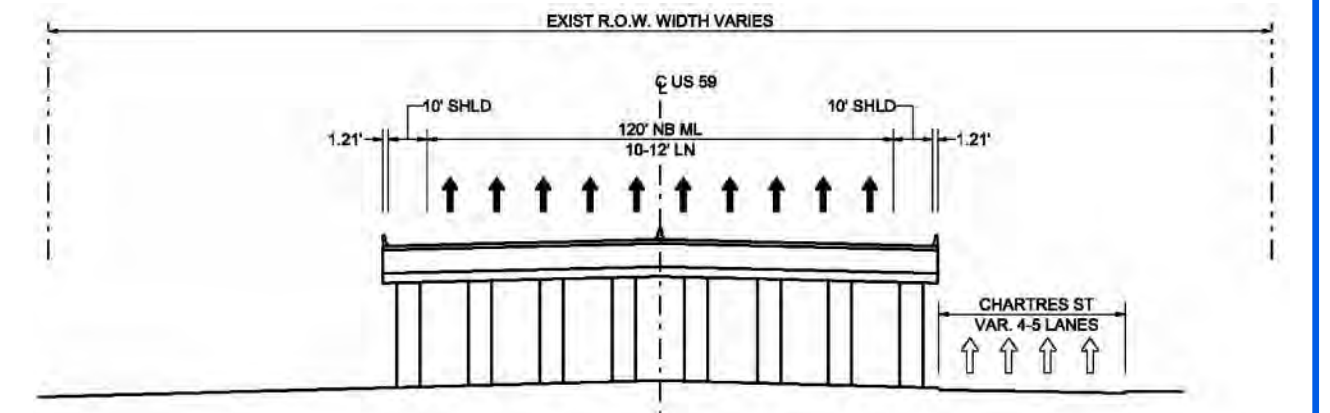


EXISTING TYPICAL SECTION - US 59



SELECTED AS PRELIMINARY ALTERNATIVE

PROPOSED TYPICAL SECTION - US 59 (ALTERNATIVE 3)



IH 45 NORTH HOUSTON HIGHWAY IMPROVEMENT PROJECT

HARRIS COUNTY



IH 45 NORTH - UNIVERSE OF ALTERNATIVES

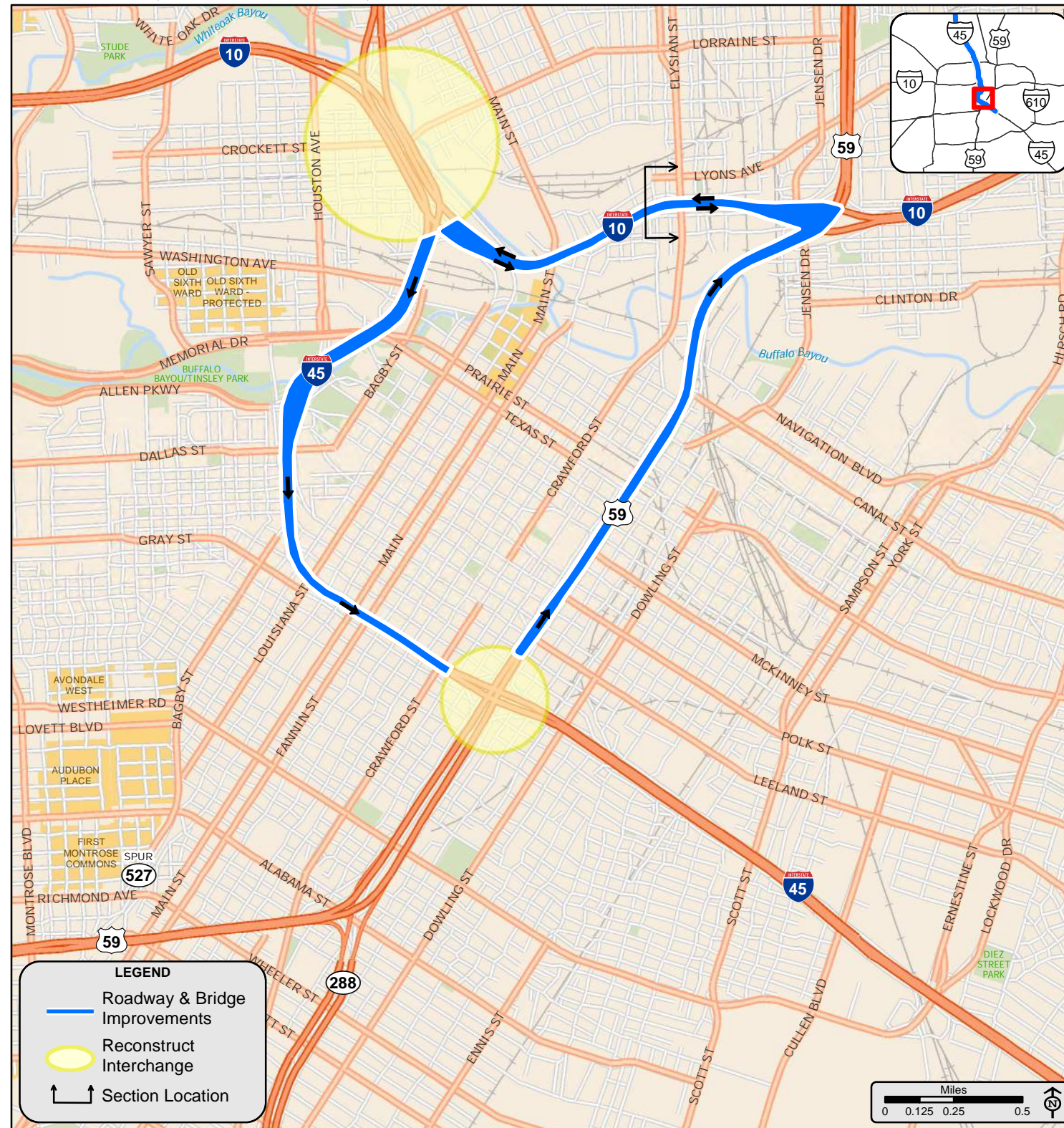
PRELIMINARY: SUBJECT TO CHANGE

SEGMENT 3

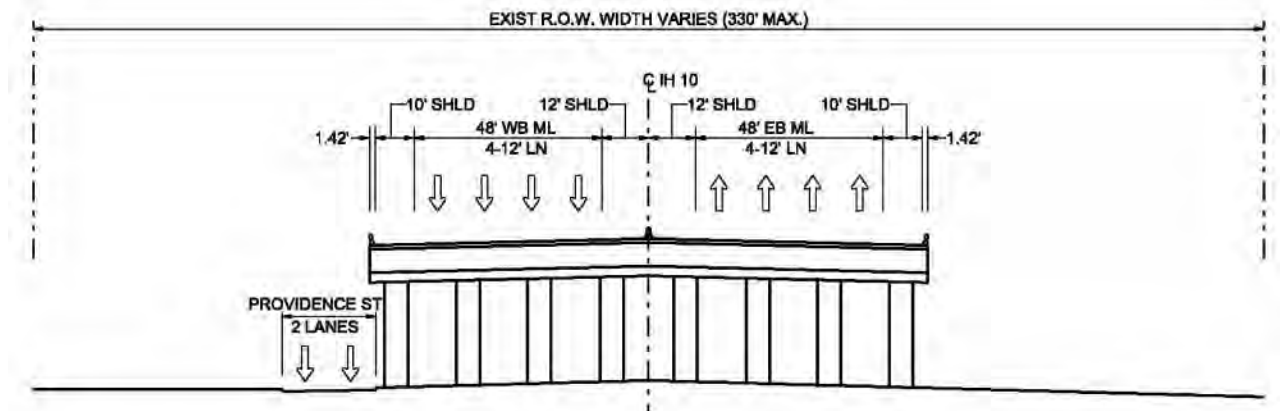
LIMITS: IH 10 TO IH 45/US 59 INTERCHANGE

LENGTH: 2.8 MILES

ESTIMATED COST (CONSTRUCTION & DESIGN):

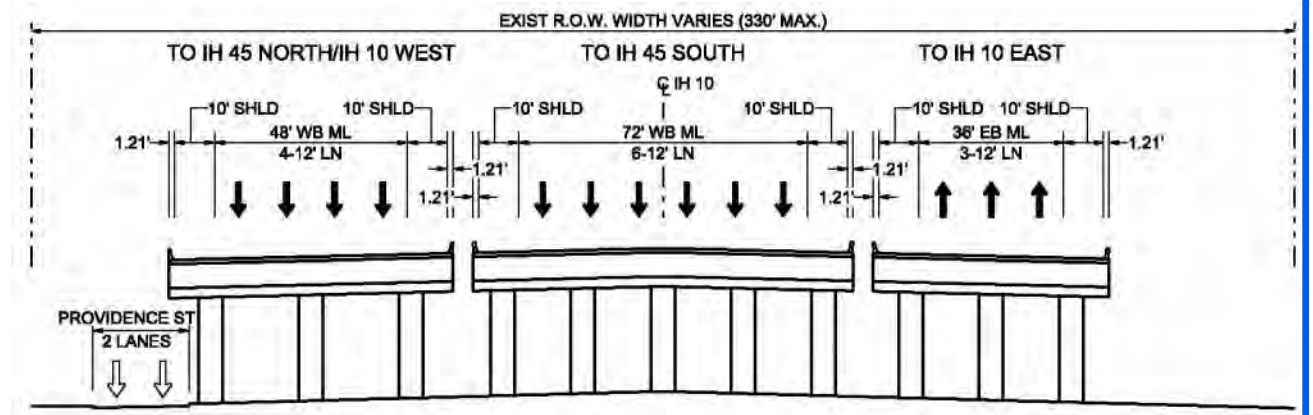


EXISTING TYPICAL SECTION - IH 10



SELECTED AS PRELIMINARY ALTERNATIVE

PROPOSED TYPICAL SECTION - IH 10 (ALTERNATIVE 3)



IH 45 NORTH HOUSTON HIGHWAY IMPROVEMENT PROJECT

HARRIS COUNTY



IH 45 NORTH - UNIVERSE OF ALTERNATIVES

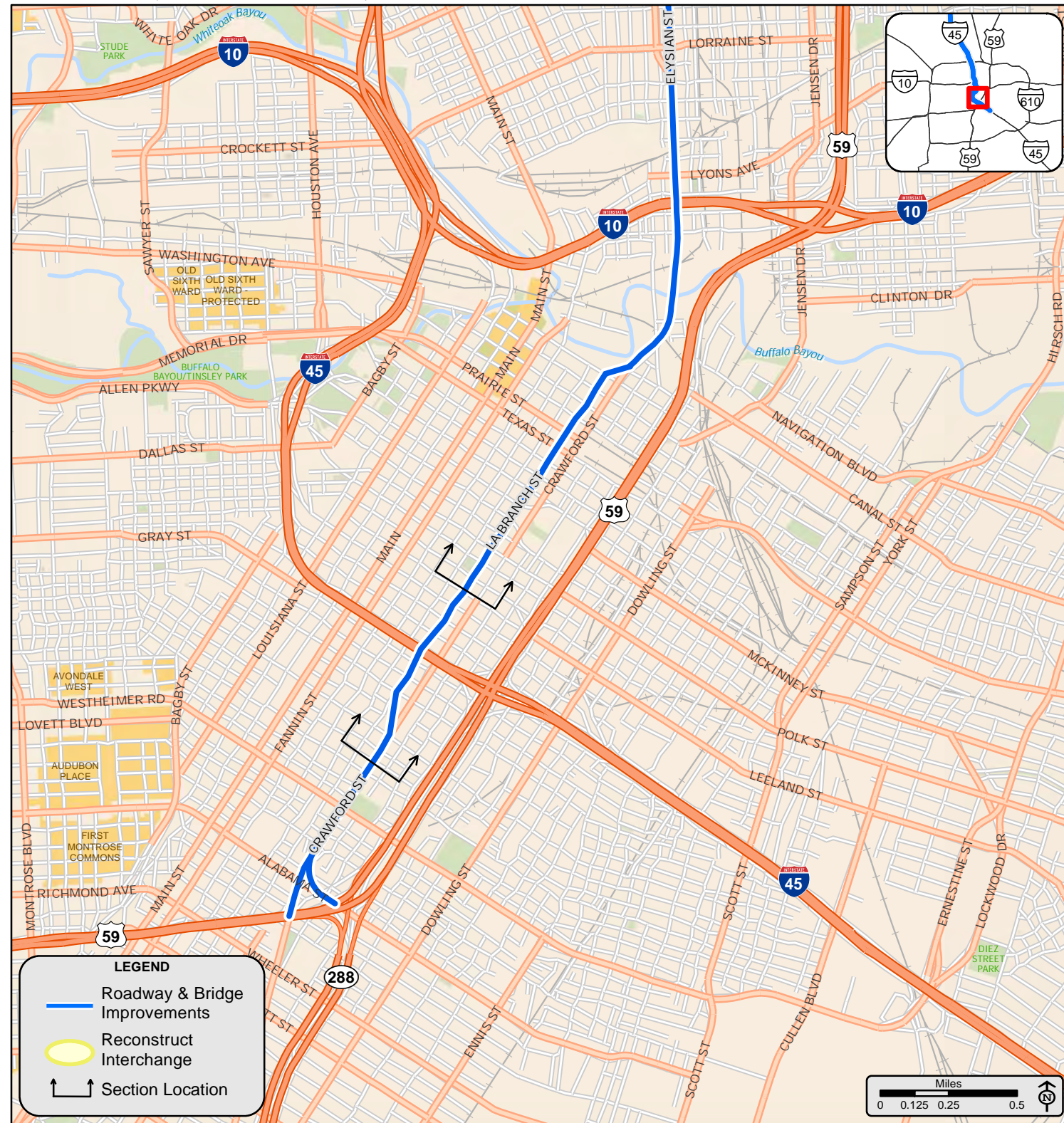
PRELIMINARY: SUBJECT TO CHANGE

SEGMENT 3

LIMITS: IH 10 TO IH 45/US 59 INTERCHANGE

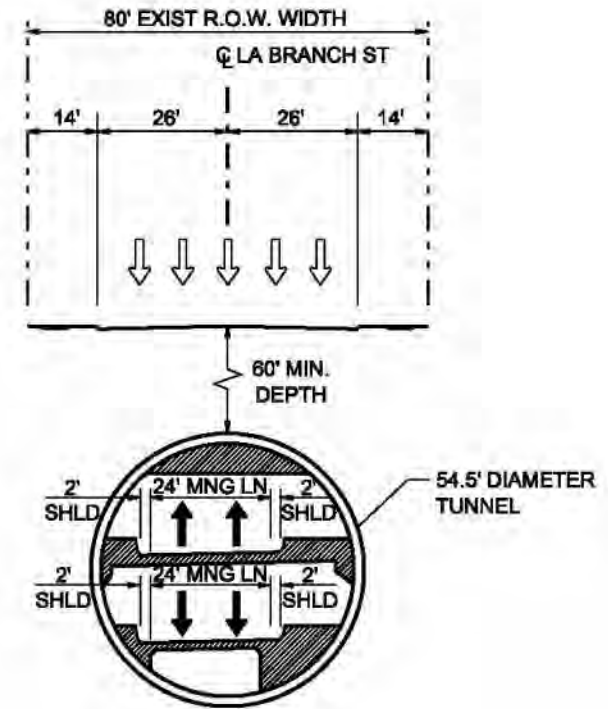
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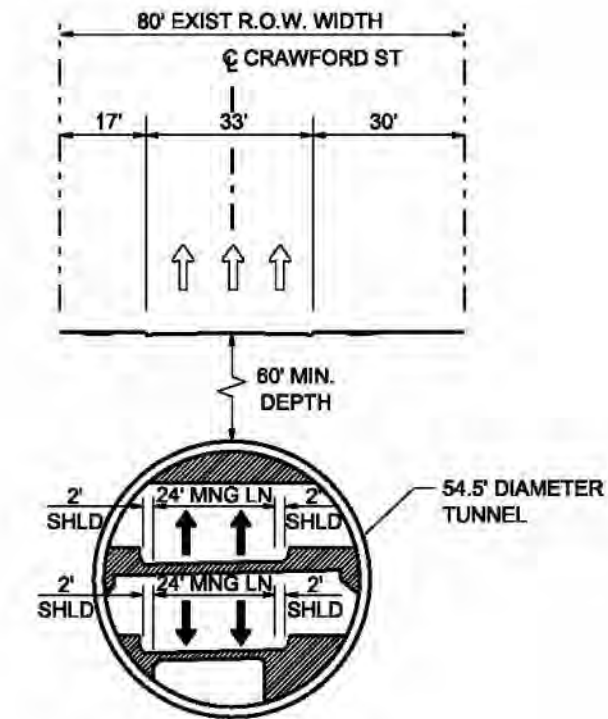


SELECTED AS PRELIMINARY ALTERNATIVE

PROPOSED TYPICAL SECTION - LA BRANCH (ALTERNATIVE 4)



PROPOSED TYPICAL SECTION - CRAWFORD (ALTERNATIVE 4)



IH 45 NORTH HOUSTON HIGHWAY IMPROVEMENT PROJECT

HARRIS COUNTY



IH 45 NORTH - UNIVERSE OF ALTERNATIVES

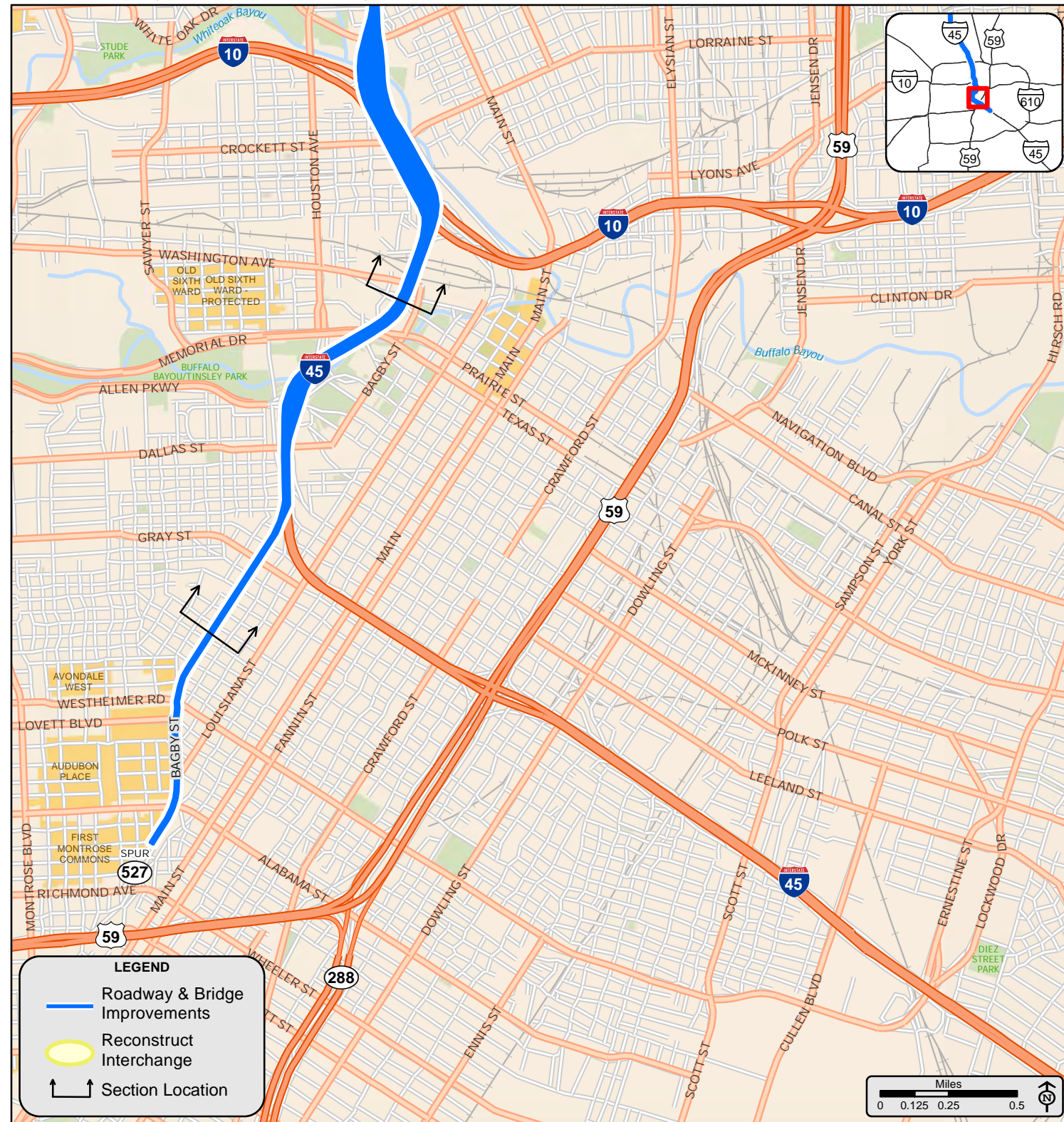
PRELIMINARY: SUBJECT TO CHANGE

SEGMENT 3

LIMITS: IH 10 TO IH 45/US 59 INTERCHANGE

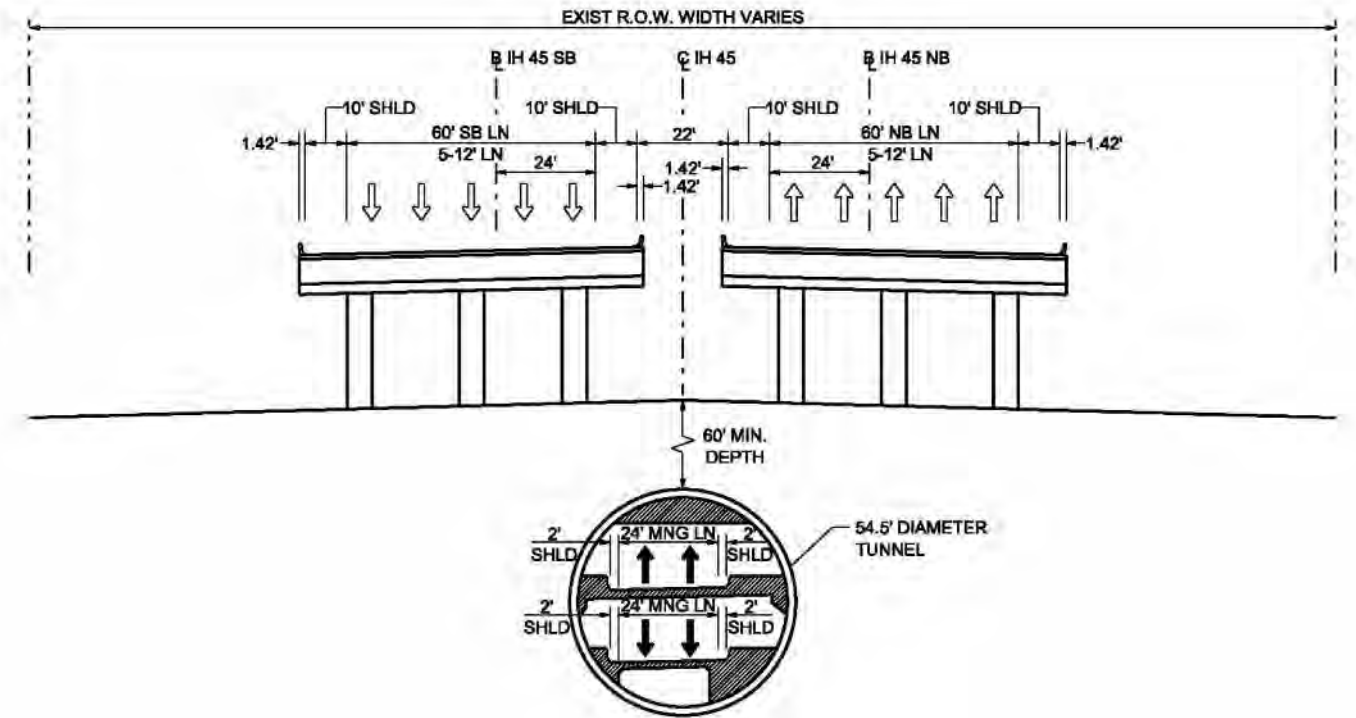
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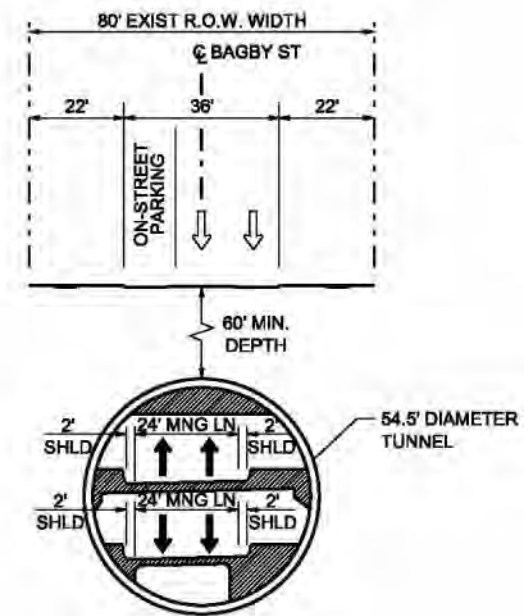


SELECTED AS PRELIMINARY ALTERNATIVE

PROPOSED TYPICAL SECTION - IH 45 (ALTERNATIVE 5)



PROPOSED TYPICAL SECTION - BAGBY (ALTERNATIVE 5)



IH 45 NORTH HOUSTON HIGHWAY IMPROVEMENT PROJECT

HARRIS COUNTY



IH 45 NORTH - UNIVERSE OF ALTERNATIVES

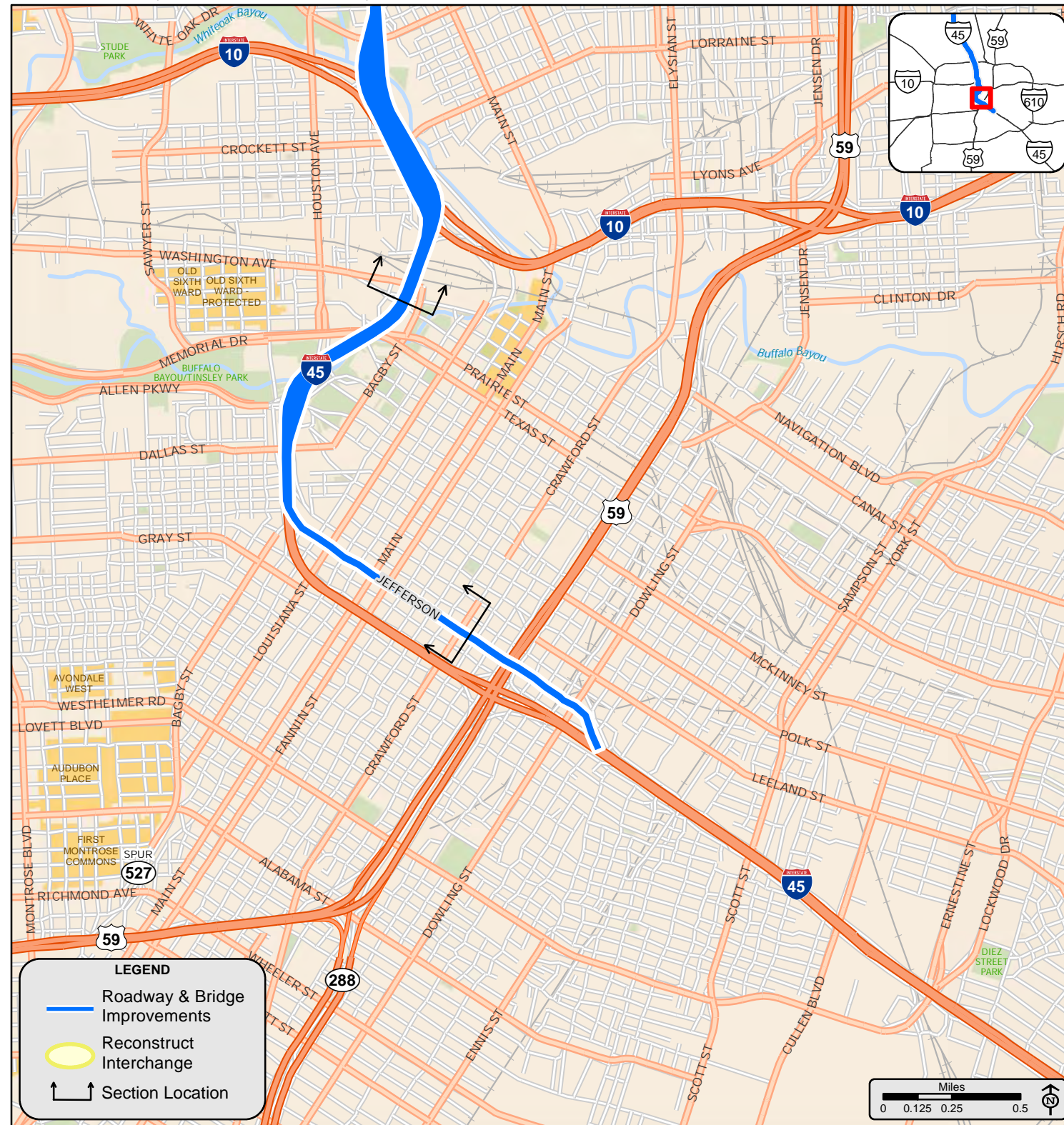
PRELIMINARY: SUBJECT TO CHANGE

SEGMENT 3

LIMITS: IH 10 TO IH 45/US 59 INTERCHANGE

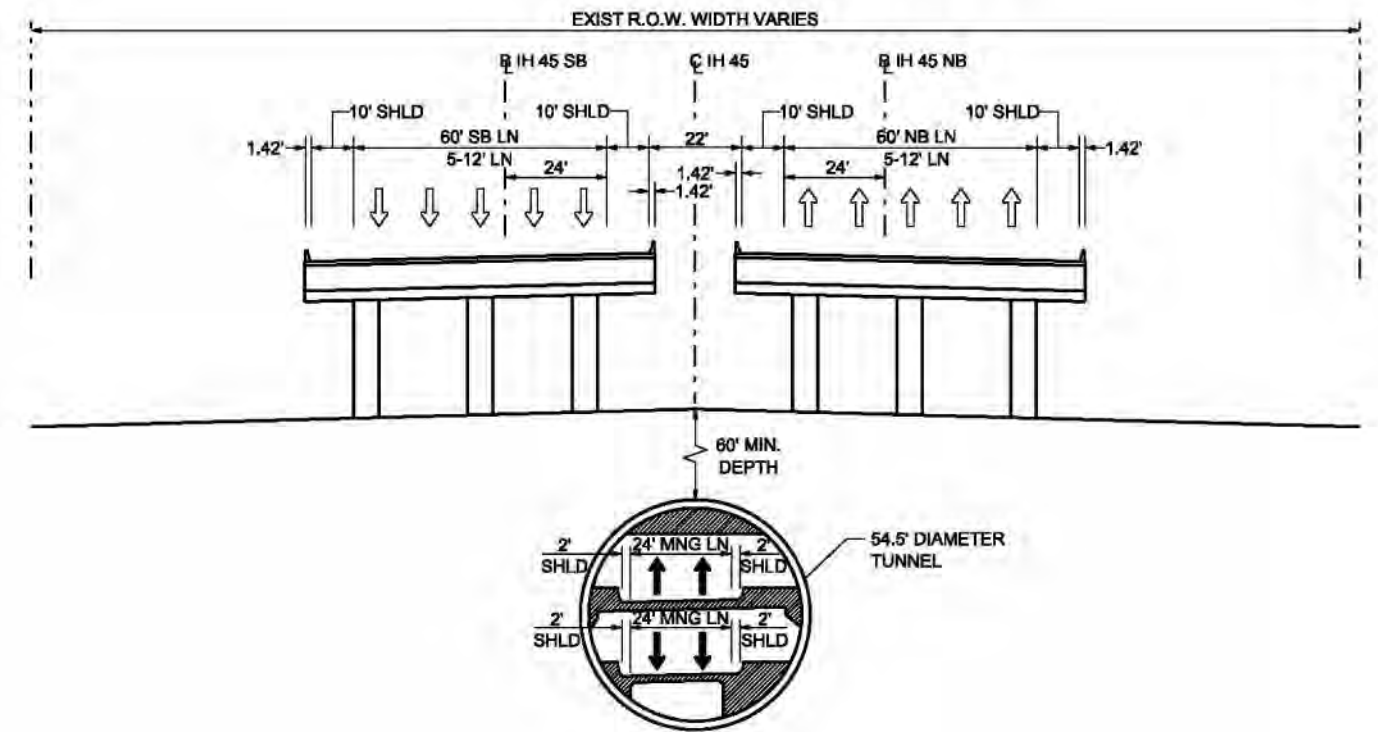
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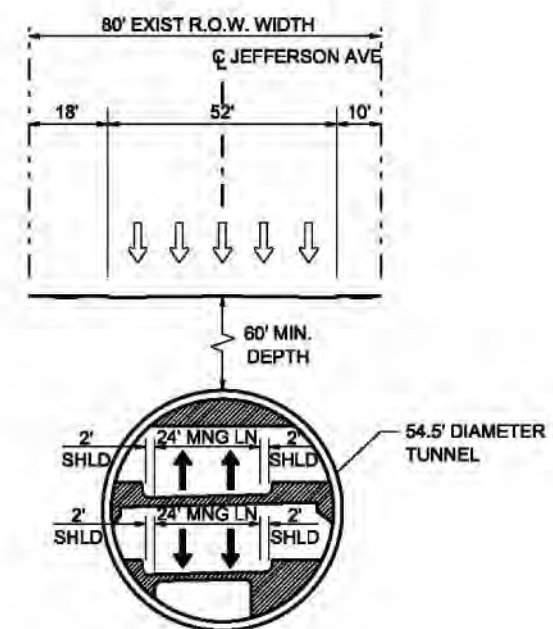


SELECTED AS PRELIMINARY ALTERNATIVE

PROPOSED TYPICAL SECTION - IH 45 (ALTERNATIVE 6)



PROPOSED TYPICAL SECTION - JEFFERSON (ALTERNATIVE 6)



IH 45 NORTH HOUSTON HIGHWAY IMPROVEMENT PROJECT

HARRIS COUNTY



IH 45 NORTH - UNIVERSE OF ALTERNATIVES

PRELIMINARY: SUBJECT TO CHANGE

SEGMENT 3

LIMITS: IH 10 TO IH 45/US 59 INTERCHANGE

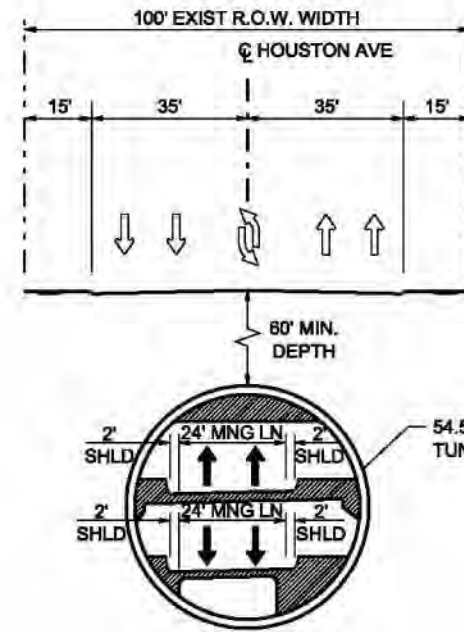
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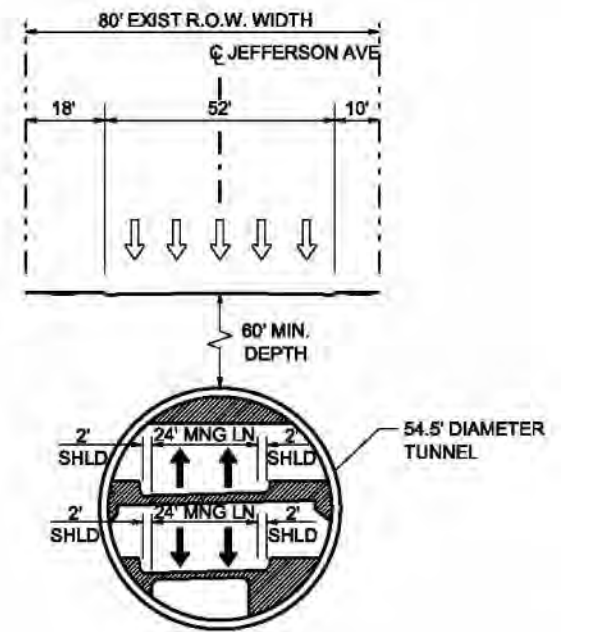


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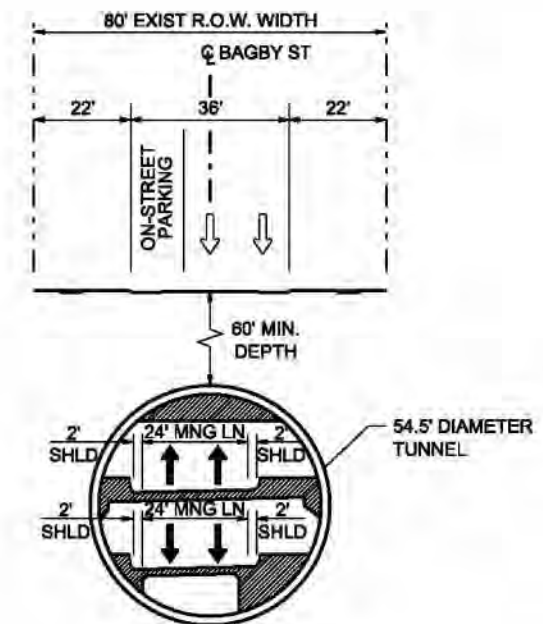
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PROPOSED TYPICAL SECTION - JEFFERSON (ALTERNATIVE 7)



PROPOSED TYPICAL SECTION - BAGBY (ALTERNATIVE 7)



IH 45 NORTH HOUSTON HIGHWAY IMPROVEMENT PROJECT

HARRIS COUNTY



IH 45 NORTH - UNIVERSE OF ALTERNATIVES

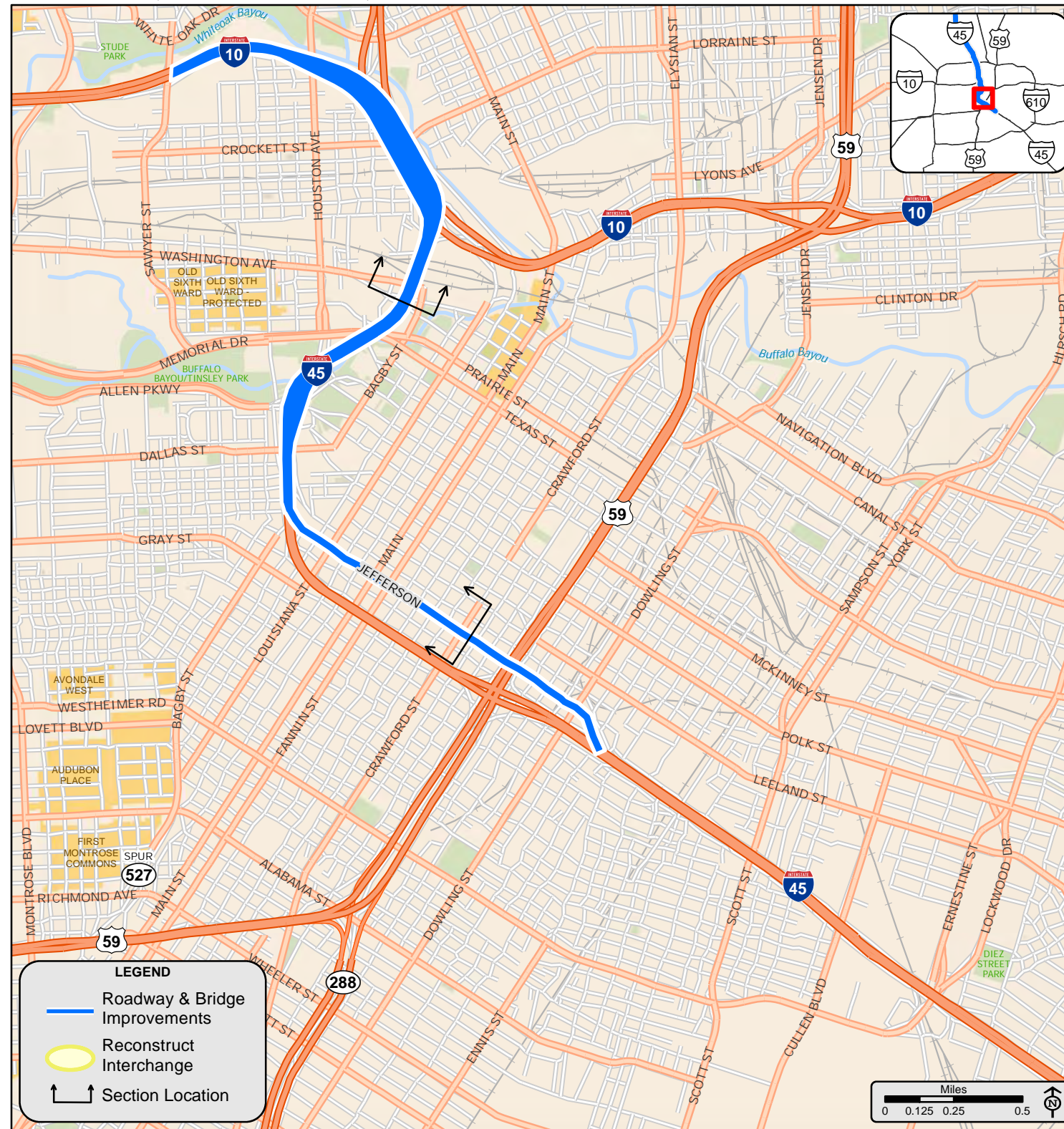
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SEGMENT 3

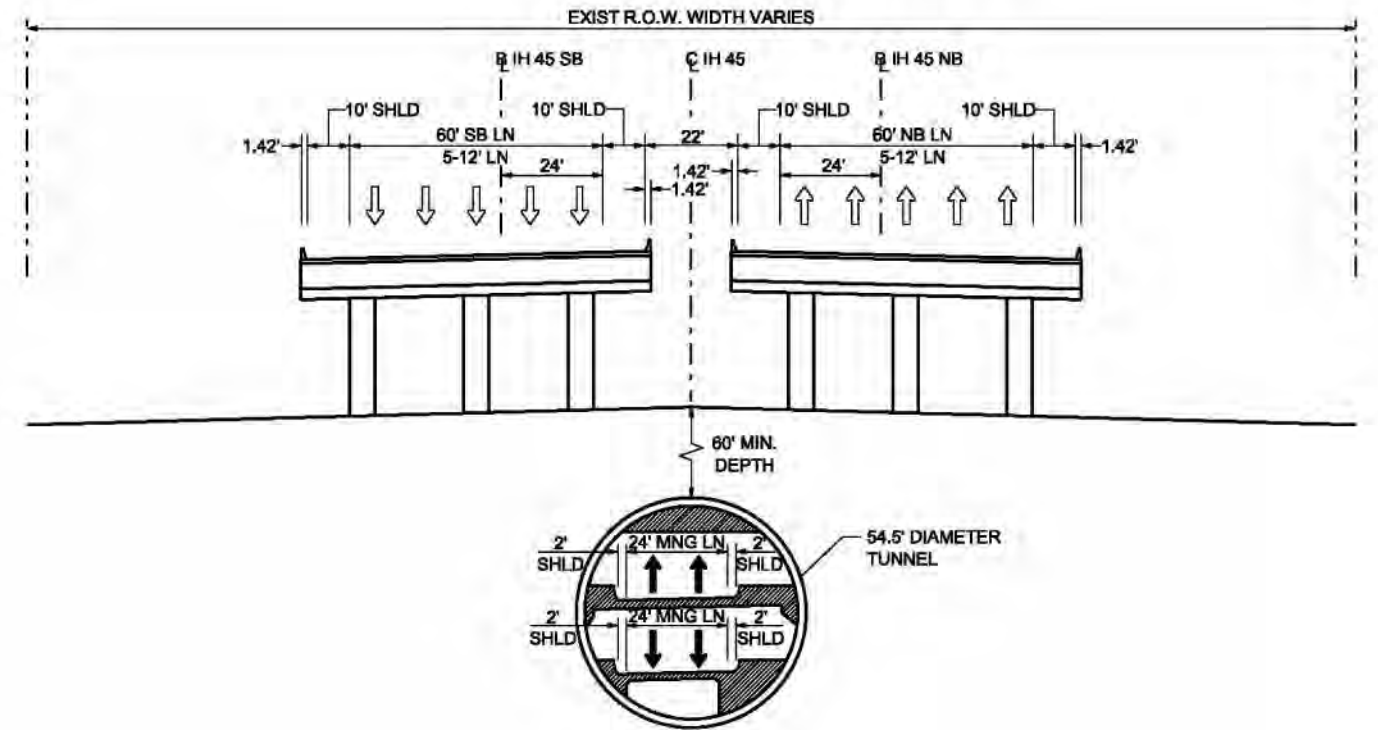
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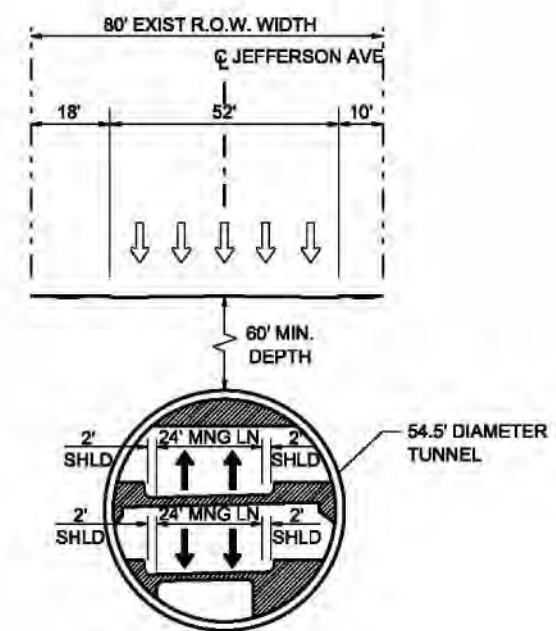
ESTIMATED COST (CONSTRUCTION & DESIGN):



PROPOSED TYPICAL SECTION - IH 45 (ALTERNATIVE 9)



PROPOSED TYPICAL SECTION - JEFFERSON (ALTERNATIVE 9)



IH 45 NORTH HOUSTON HIGHWAY IMPROVEMENT PROJECT

HARRIS COUNTY



Attachment F. Coordination

TEXAS HISTORICAL COMMISSION
real places telling real stories

November 2, 2018

Renee Benn
Texas Department of Transportation, Environmental Division
125 East 11th Street
Austin, Texas 78701-2483

Re: *Project Review Under Section 106 of the National Historic Preservation Act, North Houston Highway Improvement Project, Determinations of Eligibility and Findings of Effect, Houston, Harris County (TxDOT/106, THC #201900856, CSJ 0912-00-146)*

Ms. Benn:

Thank you for your correspondence of October 4, 2018, which summarizes the results of the Report for Historical Studies Survey prepared by CP&Y, Inc., on behalf of the Texas Department of Transportation (TxDOT), for the North Houston Highway Improvement Project (NHHIP). This letter serves as comment on the proposed undertaking from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC).

The THC staff, led by Justin Kockritz, has completed its review of the report and has major concerns about the identification and evaluation of non-archeological historic properties, the assessment of the project's effects on historic properties, and the documentation of previous consultation.

There are numerous historic-age properties within the project's Area of Potential Effect (APE) that were not inventoried, documented, or evaluated for their eligibility for listing in the National Register of Historic Places. There are also historic-age residential neighborhoods that were not evaluated as potential historic districts, including several for which THC previously provided information. For other properties, including City of Houston Landmarks and Historic Texas Cemeteries, the National Register evaluation in the report is insufficient. The report in general provides extremely limited historic context, on the project area overall and for specific properties that were surveyed, making it difficult for the reader to understand how potential historic properties were evaluated.

The assessment of the potential effects of the project to several historic properties is incomplete or inadequate. Some of this is an inherent result of the design/build process, where a full understanding of the potential effects is not possible at the schematic plan stage. However, for other properties the assessment is simply insufficient, especially with regards to indirect effects such as visual changes to the setting of historic properties.

This report also lacks a thorough accounting of previous consultation efforts, such as previous Historical Studies Surveys and communications with stakeholders. We understand that this is an enormous project—with a nearly a thousand surveyed properties, many consulting parties, and a large body of correspondence—but this makes it all the more important that this report be able to stand on its own as a complete record of TxDOT's efforts to take into account the effect of their undertaking on historic properties.

Moving forward, THC would like to work with TxDOT on what we see as two key topics for project development. First, revisions to this report to address comments herein and from other consulting parties, including a complete identification and evaluation of historic properties. This may include working together to establish survey methodologies for evaluating large mid-century residential neighborhoods, which would also pay dividends for future projects as well. Second, to discuss the procedures for consulting on the inevitable changes to the project, especially once the design/build contractor is selected and the construction plans are further developed. Defining

what types of plan changes would trigger consultation or identifying areas of particular concern to the consulting parties, and incorporating those into the project's Technical Contract Provisions and the Environmental Permits, Issues, and Commitments (EPIC), will help TxDOT and the design/build contractor plan accordingly while providing consulting parties assurances that they will be afforded the opportunity to review and comment on changes as needed.

Attached please find extensive comments on the National Register eligibility of properties surveyed within the APE, the assessment of the project's effects to historic properties, and general comments on the report. We would be happy to meet or make site visits with you, project consultants, and stakeholders as needed to discuss these comments, the historic-age resources within the APE, or the potential effects of the project on historic properties. We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review, or if we can be of further assistance, please contact Justin Kockritz at 512-936-7403 or justin.kockritz@thc.texas.gov.

Sincerely,



Justin Kockritz, Lead Project Reviewer, Federal Programs
For: Mark Wolfe, State Historic Preservation Officer

cc: Matthew Kriegl, City of Houston, Department of Planning and Development, *via email*
Janet Wagner, Harris County Historical Commission, *via email*
David Denenburg, Denenburg Interests, LLC, *via email*
Kirk Farris, Art & Environmental Architecture, Inc., *via email*
Thomas McWhorter, *via email*



For the purposes of compliance with Section 106 of the National Historic Preservation Act, THC concurs that the following properties are *listed* in, and remain eligible for listing in, the National Register of Historic Places under the criteria cited:

- **Near Northside Historic District** (HD #1 containing ID 001–002, 548–549, 554, 556, 558–559, 861–862, 877–881, 883, 887–888, 890–891, and 968 as contributing resources; ID 554A (outbuilding at 109 Carl Street) is non-contributing as it does not date to the historic district’s period of significance and/or it no longer retains sufficient historic integrity due to additions and alterations): Criterion A for community planning and development and Criterion C for architecture;
- **Downtown Houston Post Office, Processing and Distribution Center** (ID 581, 401 Franklin Street): Criterion A for politics/government and Criterion C for architecture;
- **1879/1926 Houston Waterworks** (ID 004, 27 Artesian Street): Criterion A for industry;
- **Cheek-Neal Coffee Company Building** (ID 016, 2017 Preston Street): Criterion A for industry; and,
- **Myers-Spalti Manufacturing Plant** (ID 017, 2115 Runnels Street): Criterion A for industry and Criterion C for architecture.

THC also concurs with your determinations that the following properties are *eligible* for listing in the National Register under the criteria cited:

- **Germantown Historic District** (HD #2, containing ID 530–532, 534–537, 539–546, 856–874, 967, and 969 as contributing resources): Criterion A for community planning and development and Criterion C for architecture (note that the boundaries of the NR-eligible Germantown Historic District vary slightly from the boundary designated as a local historic district by the City of Houston in 2012);
- **Houston Warehouse Historic District** (HD #3, containing ID 024–025, 028–030, and 820 as contributing resources): Criterion A for commerce/industry and Criterion C for architecture;
- **Galveston, Harrisburg, and San Antonio Railroad Hospital** (ID 002, 2015 Thomas Street, now the Thomas Street Health Center): Individually eligible under Criterion A for medicine and Criterion C for architecture—also a contributing resource to the Near Northside Historic District;
- **Former Albert Sidney Johnson Jr. High School** (ID 015, 1906 Cleburne Street): Criterion C for architecture;
- **Houston Fire Station No. 5** (ID 019, 910 Hardy Street): Criterion A for politics/government;
- **Readers Distributors Warehouse** (ID 024, 1201 Naylor Street): Individually eligible under Criterion C for architecture—also a contributing resource to the Houston Warehouse Historic District;
- **San Jacinto Warehouse** (ID 025, 1125 Providence Street): Individually eligible under Criterion C for architecture—also a contributing resource to the Houston Warehouse Historic District;
- **Former Phillips 66 Gas Station** (ID 179, 5610 North Freeway): Criterion C for architecture;
- **Rossonian Cleaners** (ID 590, 3921 Alameda Road): Criterion A for commerce and Criterion C for architecture;
- **House** (ID 603, 4120 Austin Street): Criterion C for architecture;
- **Gribble Stamp Company** (ID 738, 121 St. Emanuel Street): Criterion C for architecture;
- **House** (ID 956, 3417 Baer Street): Criterion C for architecture;
- **Strauss-Bascule Railroad Bridge** (ID 966, former Houston Belt and Terminal Railroad over Buffalo Bayou): Criterion C for engineering;
- **Judge Hernandez Tunnel** (ID 975, Main Street under former Galveston, Harrisburg, and San Antonio Railroad): Criterion C for engineering; and,
- **Navigation Boulevard Underpass** (No ID): Criterion C for engineering.

At this time, THC does *not* concur with your proposed determinations of eligibility for the following properties:

- **Hidden Valley Neighborhood** (ID 065, 066, 073, 074: Houses on Sunnywood Road): Was the Hidden Valley neighborhood ever evaluated as a potential historic district? It is not evaluated in the 2015, 2016, or 2017 survey reports or the Draft Environmental Impact Statement (DEIS).
- **Rittenhouse Baptist Church** (ID 099, 513 West Rittenhouse Road): Historic aerial photographs show that this church was constructed between 1966 and 1973, not 1950 as indicated. Additional research on this property was requested in our letter of December 12, 2017 but has not been provided.
- **Northpark Neighborhood** (ID 169–174: Houses on the 5700 block of Cortlandt Street): Was the Northpark neighborhood ever evaluated as a potential historic district? It is not evaluated in the 2015, 2016, or 2017 survey reports or the DEIS.
- **Pine Grove Neighborhood** (ID 274, 279–280, 282, 284–300, 302, 304, 307–310: Houses): Was the Pine Grove neighborhood ever evaluated as a potential historic district? It is not evaluated in the 2015, 2016, or 2017 survey reports or the DEIS.
- **Lindale Park Neighborhood** (ID 418–427: Houses on 100–300 blocks of Kelley Street): Was the Lindale Park neighborhood ever evaluated as a potential historic district? It is not evaluated in the 2015, 2016, or 2017 survey reports or the DEIS. In 2004, the Federal Transit Administration (FTA) determined the neighborhood as eligible for listing in the National Register under Criterion A for community planning and development as part of the Houston Metropolitan Transit Agency’s (METRO) North Corridor (Red Line). Although an intensive evaluation of the historic district was not performed, and delineating the full boundaries was beyond the scope of FTA’s project, the Final Environmental Impact Statement (FEIS) for the project suggests that the boundaries may extend as far as Crosstimbers Street on the north, Hardy Toll Road and Maury Street on the east, Cavalcade Street on the south, and IH 45 on the west.
- **Fraternal Order of Police Lodge** (ID 457, 3130 North Freeway): According to the Harris County Central Appraisal District, this property was previously owned by “Cement Masons Local” (presumably a chapter of the Operative Plasterers’ and Cement Masons’ International Association (OPCMIA)), though they may not have been the original owner or builder. Is there any information about the original owner/builder of the site? If built by the OPCMIA (or other building trades union), are there any distinctive or decorative features indicative of the group?
- **Irvington Park Neighborhood** (ID 474–493: Houses): Was the Irvington Park neighborhood ever evaluated as a potential historic district? It is not evaluated in the 2015, 2016, or 2017 survey reports or the DEIS. In 2004, the FTA determined the neighborhood as eligible for listing in the National Register under Criterion A for community planning and development as part of the METRO North Corridor (Red Line). Although an intensive evaluation of the historic district was not performed, and delineating the full boundaries was beyond the scope of FTA’s project, the FEIS for the project suggests that the boundaries may extend as far as Cavalcade Street on the north, Maury Street on the east, Collingsworth Street and the Little White Oak Bayou on the south, and IH 45 on the west.
- **Houses** (ID 511–526, Oleander, Farwood, and Woodland Streets): In our previously letter of December 17, 2017, THC inquired if these properties were historically associated with the Germantown Historic District, located on the opposite side of IH 45. If additional information was gathered, or if there was additional correspondence with TxDOT historians and/or previous THC staff, this should be addressed in this HRSR.
- **Hulsey-Davis House** (ID 544, 1216 Wrightwood Street): This property was designated as a local historic landmark in 2015. THC recommends that this property is a *contributing* resource to the Germantown Historic District and potentially individually eligible for listing in the National Register under Criterion C for its architecture.
- **Houses** (ID 571 and 572, 1204 and 1200 Shearn Street): Additional information on these properties was requested in our previous letter of December 12, 2017, including considering them as potential contributing resources to an expanded High First Ward Historic District, even if the existing boundaries of the local historic district are outside of the project APE.

- **Warehouse** (ID 725/726, 2105 McKinney Street): When were the Asian-inspired awnings added? When was this area referred to as China Town? Since no historic context on this area as China Town is provided, how can the conclusion be reached that this property lacks a significant association with China Town. The Sanborn Map excerpt (page 990 of the overall PDF) shows the wrong property. This building is on the 2100 block of McKinney Street, between St. Emanuel and Hutchins Streets; the map excerpted shows the 2200 block of McKinney Street, between Hutchins and Bastrop Streets. The 1951 Sanborn Map labels this property as the Damon Wells Warehouse and the existing footprint appears to be consistent since then. Is this property actually associated with the Westheimer family, or is that just based on the incorrect Sanborn map? Please reevaluate this property within the proper context. Similar comments were previously made in our letter of December 12, 2017 and have not been addressed.
- Former **Baglio Grocery** (ID 801, 920 Gregg Street): This building was constructed circa 1918 and originally served as a grocery run by Sicilian immigrant Michele Baglio. THC recommends evaluating this property under potential Criterion A significance.
- **Hollywood Cemetery** (ID 855 and 855.1, 3506 North Main Street): This cemetery was designated as a Historic Texas Cemetery (HTC) in 2009. To receive the HTC designation, cemeteries must have significant historical associations and THC generally recommends that they are eligible for listing in the National Register and satisfy Criteria Consideration D. The evaluation included in the survey is inadequate. Similar comments were previously made in our letter of December 12, 2017 and have not been addressed. Also, show the boundary of the cemetery on the maps.
- **Butler Brothers Union Terminal Warehouse** (ID 908, 1002–1008 Washington Avenue, now the Houston Permitting Center): This property was designated as a local historic landmark in 2012. THC recommends that this property is *eligible* for listing in the National Register under Criterion C for its architecture.

The following properties do not appear to have been documented or evaluated in this report, despite being within the APE and being of historic age:

- **Sam Houston Park**: The Park itself was designated as a local historic landmark in 2007. The Park also contains several historic-age houses that were not included in the HRSR, including the **Nichols-Rice-Cherry House**, the **Pillot House**, and the **San Felipe Cottage**, each of which were designated as a Recorded Texas Historic Landmark (RTHL) in 1967.
- **Third Ward Historic District** and the **Third Ward South Historic District**: Both historic districts were determined eligible for listing in the National Register by the FTA in 2007 as part of the METRO University Corridor (Purple Line) light rail. THC recommends that ID 683–692, 909, and 911–945, all historic-age properties within, or adjacent to, these historic districts, be evaluated as potential contributing resources. An extension of the western boundaries of these historic districts to IH 69 may be warranted. Information on these historic districts was provided by THC to the consultants in April 2018.
- **Adath Emeth Cemetery** (1540 Sylvester Rd): This cemetery was designated as an HTC in 2010.
- **Eichwurzel Cemetery** (5711 Enid Street): This cemetery was designated as an HTC in 2009.
- **Holy Cross Cemetery** (3502 North Main Street): This cemetery was designated as an HTC in 2010.
- **City Hall Annex** (900 Bagby Street): This building was constructed between 1966–1973.
- **Railroad Bridge** (former Galveston, Harrisburg, and San Antonio Railroad over White Oak Bayou and IH 45/IH 10): This bridge was constructed in the early 1960s when the freeway was built.
- Two Former **Railroad Bridges** (former Missouri-Kansas-Texas Railroad over White Oak Bayou, now part of the White Oak Bayou Greenway Trail): One bridge is just north of the Hogan/Crockett Street bridge and one is directly under IH 10.
- **Park** (1700 block of Brazos Street): This park was developed between 1962–1964. Is this a city-owned park? Was it developed as part of the master plan for the adjacent Cullen Center (including the Whitehall Hotel at 1700 Smith Street and the 500 Jefferson Building)?

- Former **Crawford Elementary School** (1510 Jensen Street): Portions of this building date to the 1950s, with additions in the 1960s.
- **Pleasant Grove Missionary Baptist Church** (2801 Conti Street): The earliest portion of this church was built between 1945–1951, with expansions between 1957–1962 and the dome addition between 1973–1981.
- Former **Koppel & Wascher Mattress Factory** (2000 Nance Street): This building, at the far south end of the parcel (ID 958) was not evaluated.

The following historic-age properties were not evaluated in the survey, but THC recommends no further evaluation is warranted, pending comments or additional information from the consulting parties:

- **Warehouse** (1018 West Street); and,
- **Shopping Center** (430 West Parker Road).

Based on all available information, THC concurs that the following properties are *not eligible* for listing in the National Register:

- **Kenilworth Grove Neighborhood;**
- **Birdsall Place Neighborhood;**
- **Wildrose Gardens Neighborhood;**
- **Glenburnie/Graceland Terrace Neighborhood;**
- The remaining properties included in this HRSR not mentioned above.

Comments on Determinations of National Register Eligibility

Property	THC Comments
ID 056: Iglesia Cristiana La Senda Antigua (9600 North Freeway)	As noted in our previous letter of December 12, 2017, the single photograph of this property does not show the primary façade facing the North Freeway frontage road and its decorative stained glass.
ID 065, 066, 073, 074: Houses (Sunnywood Road)	Was the Hidden Valley neighborhood ever evaluated as a potential historic district? It is not evaluated in the 2015, 2016, or 2017 survey reports or the DEIS.
ID 099: Rittenhouse Baptist Church (513 West Rittenhouse Road)	Historic aerial photographs show that this church was constructed between 1966 and 1973, not 1950 as indicated. Additional research on this property was requested in our letter of December 12, 2017 but has not been provided.
ID 169–174: Houses (5700 block of Cortlandt Street)	Was the Northpark neighborhood ever evaluated as a potential historic district? It is not evaluated in the 2015, 2016, or 2017 survey reports or the DEIS.
ID 251: 4505 Airline Drive	This property is not included in the tabular inventory.
ID 256: 1319 Crosstimbers Street	This property is not included in the tabular inventory or the survey forms.
ID 274, 279–280, 282, 284–300, 302. 304, 307–310: Houses	Was the Pine Grove neighborhood ever evaluated as a potential historic district? It is not evaluated in the 2015, 2016, or 2017 survey reports or the DEIS.
ID 418–427: Houses (100–300 blocks of Kelley Street)	Was the Lindale Park neighborhood ever evaluated as a potential historic district? It is not evaluated in the 2015, 2016, or 2017 survey reports or the DEIS. In 2004, the FTA determined the neighborhood as eligible for listing in the National Register under Criterion A for community planning and development as part of the METRO North Corridor (Red Line). Although an intensive evaluation of the historic district was not performed, and delineating the full boundaries was beyond the scope of FTA’s project, the FEIS for the project suggests that the boundaries may extend as far as Crosstimbers Street on the north, Hardy Toll Road and Maury Street on the east, Cavalcade Street on the south, and IH 45 on the west.
ID 457: Fraternal Order of Police Lodge (3130 North Freeway)	According to the Harris County Central Appraisal District, this property was previously owned by “Cement Masons Local” (presumably a chapter of the Operative Plasterers’ and Cement Masons’ International Association (OPCMIA)), though they may not have been the original owner or builder. Is there any information about the original owner/builder of the site? If built by the OPCMIA (or other building trades union), are there any distinctive or decorative features indicative of the group?
ID 523: House (3224 Mainford Street)	This property is not included in the survey forms.
ID 538: House (306 Payne Street)	This property is not included in the tabular inventory or the survey forms.
ID 539: House (221 Parkview Street)	This property is noted as contributing to the Germantown HD on the survey form but noted as not eligible on the tabular inventory. Revise as needed.
ID 544: Hulsey-Davis House (1216 Wrightwood Street)	This property is designated as a local landmark. THC recommends that the property is contributing to the Germantown HD.

Comments on Determinations of National Register Eligibility

Property	THC Comments
ID 546: House (1212 Wrightwood Street)	This property is noted as contributing to the Germantown HD on the survey form but noted as not eligible on the tabular inventory. Revise as needed. THC recommends this property is a contributing resource. Also, revise the boundary of the Germantown HD as necessary.
ID 550, 551, 555, 557, 560: Houses (In Near Northside NR HD)	These properties should be noted as “non-contributing to the Near Northside Historic District,” instead of “not eligible.”
ID 565: House (1518 Weber Street)	This property was included in a site visit by TxDOT staff and consultants and THC staff in January 2018, and afterwards, THC concurred that the property was not eligible for listing in the National Register. However, the results of that site visit and any follow-up correspondence should be included in this HRSR.
ID 566: Warehouse (2200 Houston Avenue)	Revise the map to show that the surveyed property included the brick warehouse building facing Houston Avenue.
ID 580: Former Tennison Hotel (110 Bagby Street)	THC recommends that this property was likely architecturally significant, but that due to recent alterations and additions in no longer retains sufficient historic integrity for listing in the National Register.
ID 581: Downtown Houston Post Office, Processing and Distribution Center (401 Franklin Street)	Please use the historic name of the property, matching the National Register nomination. Also, please revise to note that the property was officially listed in the National Register in 2018.
ID 688: House (2102 Hadley Street)	This property is within the Third Ward Historic District, which was determined eligible for listing in the National Register by the FTA in 2007. However, this property post-dates the Third Ward HD period of significance and should be considered as a non-contributing resource.
ID 689–690: Houses (2200 block of St. Emanuel Street)	THC recommends that these properties be evaluated as part of an expanded Third Ward Historic District. The house immediately to the rear of ID 690 should also be included in this evaluation.
ID 691: Berean Seventh-Day Adventist Church (2115 St. Emanuel Street)	THC recommends that this property be evaluated as part of an expanded Third Ward Historic District. This church is present on the 1950 Sanborn map of the area; please revise the construction date as appropriate.
ID 822: Vacant lot (421 North Main Street)	This property is shown on the map but was demolished circa 2010.
ID 867: House (201 Payne Street)	This property is shown on the map, but is not included in the tabular inventory or the survey forms. THC recommends this property is contributing to the NR-eligible Germantown Historic District.
ID 874: House (215 Parkview Street)	The survey concludes this property is “not individually eligible” but THC recommends that it is contributing to the NR-eligible Germantown Historic District.
ID 912–945: Houses	These properties are within, or adjacent to, the Third Ward HD or the Third Ward South HD, both of which were determined eligible for listing in the National Register by the FTA in 2007. THC recommends evaluating these properties as potential contributing resources to these historic districts.
ID 957.1: Warehouse (2103 Lyons Avenue)	Please show the boundaries for ID 957.1 on the map.

Comments on Determinations of National Register Eligibility

Property	THC Comments
ID 964: UH-Downtown Shea Street Building (316 North Main Street)	This building appears to have been constructed in the mid-2000s. If some portion of it does date to 1964, it is not visible in the photograph or described in the survey form.
ID 967 and 969: Woodland Park	There is no evaluation of these properties. At this time, THC recommends that they are contributing to the Germantown Historic District.
ID 974: Kelly Courts (also known as Kelly Village, 3118 Green Street)	THC recommends that this property is likely historically significant as one of the earliest public housing developments in Houston, but that due to recent alterations, it no longer retains sufficient historic integrity to be eligible for listing in the National Register.

Comments on Findings of Effect

Property	Finding	Comments/Conditions
ID 179: Former Phillips 66 Gas Station (5610 North Freeway)	CNAE	THC concurs that the project would have no adverse effect if no right-of-way is taken from the property and the property remains adjacent to a surface-level frontage road, as shown on the Public Hearing Layout—Segment 1 (dated 5/3/2017). However, the description of the proposed right-of-way on page 33 is confusing. Presumably the right-of-way line adjacent to the property will remain as is and the right-of-way overall will be widened to the west.
Germantown Historic District (HD #2)	TBD	<p>The FEIS Schematic—Segment 3 (dated 7/31/2018) shows new right-of-way being taken from ID 546 (1212 Wrightwood), which is a contributing resource to the historic district (see note above about conflict between the survey form and tabular inventory). This needs to be addressed and may constitute an adverse effect on the historic property and a Section 4(f) use.</p> <p>Page 34 of the HRSR states that the existing IH 45 adjacent to the Germantown HD is elevated; it is not. Most of this stretch of the existing freeway is below the grade of the Germantown HD (e.g. the North Street bridge over IH 45 is nearly at the same elevation as the residential neighborhoods on either side). Page 34 also states that the proposed freeway will be depressed in this area, however, the nearest section drawing (Section D, Sheet 3 of 9), shows elevated structures for main lanes, MAX lanes, and direct connectors. Was this schematic taken into account in the 2018 Noise Study or in the assessment of potential visual effects?</p> <p>Will there be any additional lighting? Where? How tall? Can lighting be directed or located to avoid or minimize any potential effects to the Germantown HD? Will construction require any impacts to Little White Oak Bayou within Woodland Park/Germantown HD? Are there any noise mitigation walls or other ancillary construction activities that are proposed?</p>
Near Northside Historic District (HD #1)	TBD	THC concurs that ID 554 (House at 109 Carl Street) is a contributing resource to the Near Northside HD, but that ID 554A (Outbuilding at 109 Carl Street) is a non-contributing resource. THC concurs that removal of ID 554A and the small right-of-way take (less than 500 square feet from the rear of the property) would have no adverse effect on historic properties; a finding of a de minimis Section 4(f) use here appears to be appropriate. However, can the right-of-way take be avoided altogether? Will there be any additional lighting? Where? How tall? Can lighting be directed or located to avoid or minimize any potential effects to the Near Northside HD? Are there any noise mitigation walls or other ancillary construction activities that are proposed?

Comments on Findings of Effect

Property	Finding	Comments/Conditions
		<p>Page 47 of the HRSR states that the proposed freeway will be depressed in this location, but the schematics and nearest section drawing (Public Hearing Layout—Segment 2, Sheet 1, Section A), shows an elevated structure for MAX lanes. Figure 17 of the HRSR also appears to show that the proposed frontage road will be above the current grade of 109 Carl Street and a substantial elevated roadway for the HOV/managed lanes. Were these schematics taken into account in the 2018 Noise Study or in the assessment of potential visual effects?</p>
<p>ID 001: Former Robert E. Lee Elementary School, (now Leonel Castillo Community Center, 2101 South Street)—a contributing resource to the Near Northside HD</p>	<p>NAE</p>	<p>THC concurs that if the proposed highway is constructed within the existing right-of-way, the project would have no adverse effect on this historic property.</p>
<p>ID 002: Former Galveston, Harrisburg, and San Antonio Railroad Hospital (now Thomas Street Health Center, 2015 Thomas Street)—a contributing resource to the Near Northside HD</p>	<p>NAE</p>	<p>THC concurs that if the proposed highway is constructed within the existing right-of-way, the project would have no adverse effect on this historic property.</p>
<p>Houston Warehouse Historic District (HD #3)</p>	<p>AE</p>	<p>THC concurs that the proposed demolition of contributing resources to the Houston Warehouse HD (ID 024 and 029) and taking of new right-of-way would have an adverse effect on this historic district. THC looks forward to receiving the Section 4(f) evaluation for this district when available, including an analysis of any feasible and prudent alternatives that completely avoid the use of Section 4(f) property and all possible planning to minimize harm to the Section 4(f) property. THC understands that in this vicinity, the proposed freeway will consist of multiple elevated structures carrying various lanes for IH 45/IH 10. Can these structures be cantilevered over one another to reduce the overall road width, shifting the freeway slightly to the north, away from the buildings (especially ID 820, 028, 025, and 030) of this historic district? Cantilevering the IH 45 southbound lanes over the IH 10 eastbound lanes, as shown on Section C, Sheet 4 of 9) has already reduced the width by 15–20 feet. Can this be repeated for the IH 45 northbound, the IH 10 westbound lanes, and/or the IH 10 MAX lanes?</p> <p>To fully take into account the removal of the existing elevated IH 10, what measures are in place, by TxDOT or others, to address street connectivity across the to-be-abandoned right-of-way and the compatibility of future development on this land?</p>
<p>ID 024 Readers Distributors Warehouse (1201 Naylor Street)—a contributing resource to the</p>	<p>AE</p>	<p>THC concurs that the proposed demolition of this property, which is eligible for listing in the National Register individually and as a contributing resource to the Houston</p>

Comments on Findings of Effect

Property	Finding	Comments/Conditions
Houston Warehouse HD and individually eligible for listing in the National Register		Warehouse HD, would have an adverse effect on this historic property. THC looks forward to receiving the Section 4(f) evaluation for this property when available, including an analysis of any feasible and prudent alternatives that completely avoid the use of Section 4(f) property and all possible planning to minimize harm to the Section 4(f) property.
ID 820: Metro Transit Authority (1116 Naylor Street)—a contributing resource to the Houston Warehouse HD	TBD	<p>THC concurs that the proposed right-of-way taking from the parking lot here would have no direct adverse effect on this historic property. However, THC does object to the statement that this “would not be considered a use under Section 4(f).” The boundary of the Houston Warehouse HD (as proposed by SWCA in 2016 and as concurred with in this HRSR) includes this entire parcel, a portion of which will be permanently incorporated into the new transportation facility. A finding of a de minimis Section 4(f) use here may be appropriate.</p> <p>Will the construction of these elevated lanes cause any vibratory effects to this historic building? What stipulations will be included in the Design/Build Technical Contract Provisions to ensure there is no adverse effect to this historic building? What effects will the proposed construction have on the setting of this historic property? As noted in National Register Bulletin 15, a historic property’s setting “involves how, not just where, the property is situated and its relationship to surrounding features and open space.” A comment on the view to/from only the front façade is not an adequate evaluation of the potential effects to the setting. Also, see comments above about the possibility of reducing the overall road width.</p>
ID 028: Former Bottling Works (now Walter’s Downtown, 1120 Naylor Street)—a contributing resource to the Houston Warehouse HD	TBD	<p>THC concurs that the proposed right-of-way taking from the parking lot here would have no direct adverse effect on this historic property. However, THC does object to the statement that this “would not be considered a use under Section 4(f).” The boundary of the Houston Warehouse HD (as proposed by SWCA in 2016 and as concurred with in this HRSR) includes this entire parcel, a portion of which will be permanently incorporated into the new transportation facility. A finding of a de minimis Section 4(f) use here may be appropriate.</p> <p>Before we can complete our review of potential indirect effects to this historic property, please provide information on the distance between this building and the proposed elevated freeway lanes and the spacing of the support piers. Will the construction of these elevated lanes cause any vibratory effects to this historic building? What stipulations will be included in the Design/Build Technical Contract Provisions to</p>

Comments on Findings of Effect

Property	Finding	Comments/Conditions
		<p>ensure there is no adverse effect to this historic building? What effects will the proposed construction have on the setting of this historic property? As noted in National Register Bulletin 15, a historic property’s setting “involves how, not just where, the property is situated and its relationship to surrounding features and open space.” A comment on the view to/from only the front façade is not an adequate evaluation of the potential effects to the setting. Also, see comments above about the possibility of reducing the overall road width.</p>
<p>ID 025: San Jacinto Warehouse (1125 Providence Street)—a contributing resource to the Houston Warehouse HD and individually eligible for listing in the National Register</p>	<p>TBD</p>	<p>THC concurs that the proposed right-of-way taking from the parking lot here would have no direct adverse effect on this historic property if the taking and the construction of the highway do not directly affect the building, the awning, or the raised loading dock; a finding of a de minimis Section 4(f) use here appears to be appropriate.</p> <p>Before we can complete our review of potential indirect effects to this historic property, please provide information on the distance between this building and the proposed elevated freeway lanes and the spacing of the support piers. Will the construction of these elevated lanes cause any vibratory effects to this historic building? What stipulations will be included in the Design/Build Technical Contract Provisions to ensure there is no adverse effect to this historic building? What effects will the proposed construction have on the setting of this historic property? As noted in National Register Bulletin 15, a historic property’s setting “involves how, not just where, the property is situated and its relationship to surrounding features and open space.” THC understands that this historic building was significantly affected by the construction of IH 10 in the late 1960s, including demolition of several of the southern bays of the building and the indirect effects of an elevated freeway nearby. Removal of the existing IH 10 elevated freeway will of course have a positive effect on the setting, but how will the new elevated freeway to the north compare, especially in terms of height and proximity? Also, see comments above about the possibility of reducing the overall road width.</p>
<p>ID 029: Carlisle Plastics Warehouse (northern metal building, 1133 Providence Street)—a contributing resource to the Houston Warehouse HD</p>	<p>AE</p>	<p>THC concurs that the proposed demolition of this building would have an adverse effect on the historic property (page 64 of the HRSR should be revised to state this explicitly). THC looks forward to receiving the Section 4(f) evaluation for this property when available, including an analysis of any feasible and prudent alternatives that completely avoid the use of Section 4(f) property and all possible planning to minimize harm to the Section 4(f) property.</p>

Comments on Findings of Effect

Property	Finding	Comments/Conditions
ID 030: Carlisle Plastics Warehouse (southern brick building, 1133 Providence Street)—a contributing resource to the Houston Warehouse HD	TBD	<p>Because this building and ID 029 appear to actually overlap, please submit demolition plans for the adjacent metal building when available and detailed photographs of the exterior and interior of both buildings.</p> <p>What effects will the proposed construction have on the setting of this historic property? As noted in National Register Bulletin 15, a historic property’s setting “involves how, not just where, the property is situated and its relationship to surrounding features and open space.” A comment on the view to/from only the front façade is not an adequate evaluation of the potential effects to the setting. Also, see comments above about the possibility of reducing the overall road width.</p>
ID 952: House (3417 Baer Street)	NE	THC concurs that if the proposed highway is constructed within the proposed right-of-way (as shown on Public Hearing Layout—Segment 3, Sheet 5 of 9), the project would have no effect on this historic property.
ID 975: Judge Hernandez Tunnel	CNAE	THC concurs that if the proposed highway is constructed within the proposed right-of-way (as shown on Public Hearing Layout—Segment 3, Sheet 3 of 9), and the construction of the proposed freeway does not directly affect the concrete railings along the western retaining wall and sidewalk of the south approach, the project would have no adverse effect on this historic property.
ID 966: Strauss-Bascule Bridge	TBD	Because this bridge is directly underneath the existing and proposed freeway, THC cannot concur with the effect finding without further information regarding the demolition of the existing roadway overhead, the construction of the new roadway, construction of any potential detention ponds, and construction notes for the protection of the bridge during the project. Will the TxDOT project include any repair or rehabilitation of the bridge, or will all work to incorporate the bridge into the Buffalo Bayou trail system be performed by others?
ID 017: Myers-Spalti Manufacturing Plant (2115 Runnels Street)	NAE	THC concurs that if the proposed highway is constructed within the proposed right-of-way (as shown on Public Hearing Layout—Segment 3, Sheet 2 of 9), the project would have no adverse effect on this historic property.
ID 738: Gribble Stamp Company (121 St. Emanuel Street)	CNAE	THC concurs that if the proposed highway is constructed within the proposed right-of-way and this historic building retains its access to St. Emanuel Street (as shown on Public Hearing Layout—Segment 3, Sheet 2 of 9), the project would have no adverse effect on this historic property.
ID 015: Former Albert Sidney Johnson Jr. High School (1906 Cleburne Street)	NAE	THC concurs that if the proposed highway is constructed within the proposed right-of-way (as shown on Public Hearing Layout—Segment 3, Sheet 7 of 9), the project would have no adverse effect on this historic property.

Comments on Findings of Effect

Property	Finding	Comments/Conditions
ID 016: Cheek-Neal Coffee Company Building (2017 Preston Street)	TBD	This effect finding should address the potential for vibratory effects from the construction of the below-grade freeway and future traffic on the freeway and frontage road (St. Emanuel Street). Reference the Technical Memos from HNTB of 3/13/18 and 4/5/18 and the Design/Build Technical Contract Provisions as necessary. The excerpts of the preliminary schematic and section drawings on page 78 of the HRSR are illegible.
ID 004: 1879/1926 Houston Waterworks (27 Artesian Street)	CNAE	THC concurs that if the proposed highway is constructed within the existing right-of-way (as shown on Public Hearing Layout—Segment 3, Sheet 9 of 9) and stipulations are included in the Design/Build Technical Contract Provisions to prevent any potential adverse vibratory effects from demolition and construction activities, the project would have no adverse effect on this historic property.
ID 581: Downtown Houston Post Office, Processing and Distribution Center (401 Franklin Street)	NAE	THC concurs that the small right-of-way take (approximately 900 square feet from the northwest corner of the property) would have no adverse effect on the historic property (page 80 of the HRSR should be revised to state this explicitly). A finding of a de minimis Section 4(f) use here appears to be appropriate.
ID 019: Houston Fire Station No. 5 (910 Hardy Street)	NE	THC concurs that if the proposed highway is constructed within the proposed right-of-way (as shown on Public Hearing Layout—Segment 3, Sheet 5 of 9), the project would have no effect on this historic property.
ID 603: House (4120 Austin Street)	NAE	THC concurs that if the proposed highway is constructed within the proposed right-of-way (as shown on Public Hearing Layout—Segment 3, Sheet 7 of 9), the project would have no adverse effect on this historic property.
ID 590: Rossonian Cleaners (3921 Alameda Road)	AE	THC concurs that the proposed demolition of this building would have an adverse effect on the historic property. THC looks forward to receiving the Section 4(f) evaluation for this property when available, including a full analysis of any prudent and feasible alternatives that avoid the use of this historic property. Could portions of proposed frontage road at this location be cantilevered over the freeway main lanes (similar to US 75 in Dallas) to reduce the required roadway width?
No ID: Navigation Boulevard Underpass (under Commerce Street and railroads)	NAE	THC concurs that if the proposed highway is constructed within the proposed right-of-way (as shown on Public Hearing Layout—Segment 3, Sheet 8 of 9), the project would have no adverse effect on this historic property.

Findings			
AE:	<i>Adverse Effect</i>	NE:	<i>No Effect</i>
CNAE:	<i>Conditional No Adverse Effect</i>	TBD:	<i>To Be Determined/ Additional Information Needed</i>
NAE:	<i>No Adverse Effect</i>		

General Comments

#	Page	Section	THC Comments
1		General	The HRSR does not contain a bibliography. This is particularly worrying given the lack of historic context, the size of the overall project, and the significance of the historic resources within the Area of Potential Effect.
2		General	A section on previous public involvement/outreach efforts, and any relevant comments received, should be included.
3		General	A section clearly describing previous Section 106 consultation should be included, especially since previous surveys for the project are referenced. Include any correspondence between TxDOT and THC where concurrence was reached on the National Register eligibility of a surveyed property and/or the effects of the project on any historic properties.
4	1	Abstract, Paragraph 1	It is just the abstract, but “addition of managed lanes” is an inadequate description of the project. Recommend that this either resemble the general language of the purpose and need or provide a brief summary of the three segments. The realignment of IH 45 seems especially important to mention here.
5	1	Abstract	For each historic property referenced here and throughout the report, include the ID number <i>and</i> the building name and/or address to avoid confusion.
6	1	Abstract, ROW List	Recommend including a short description of the limits of each section here for general reference.
7	1	Abstract, Paragraph 4	It is unclear what is meant by “One newly identified historic resources” [<i>sic</i> , revise to “resource”]. “Newly identified” since when? Is this referring to the Rossonian Cleaners building? If so, that is ID <u>590</u> not ID 509. If “newly identified” just means that the historic property was first identified by this survey, include a very short summary of the number of historic properties within the APE that were identified previously, i.e. “# historic districts and # individual properties previously listed in the National Register of Historic Places, and # historic districts and # individual properties previously determined eligible for listing in the National Register.”
8	1	Abstract	Except where specifically referring to Section 4(f) impacts, recommend using “affected” and “effects” rather than “impacted” and “impacts” here and throughout to match Section 106 language.
9	1	Abstract	Any acronyms used should be spelled out on the first use (NRHP, ROW, APE, etc.).
10	1	Abstract	A short explanation of the regulatory framework for the project would be useful, especially for consulting parties.
11	1	Abstract	Refer to properties previously listed in, or determined eligible for listing in, the National Register consistently. Some give the applicable NR criteria; some give the date of listing/determination; some give the previous project or federal agency.
12	2	Abstract, Near Northside HD & ID 554	Include that there would be “no adverse effect” to the Near Northside HD and ID 554, and therefore a de minimis impact (if that is what you are proposing).
13	2–3	Near Northside HD	The parts about “maintaining connectivity” seem unnecessary here in the Abstract.
14	2	Germantown HD	Revise to read, “located within <u>the APE</u> of Segment 2.”
15	2	Abstract, Segment 3	The parenthetical phrase after “Warehouse Historic District” is never closed.
16	2	Abstract, Segment 3	Remove “and” before “Property 590.”
17	2	Abstract, Segment 3	This section is worded confusingly. Suggest revising for clarity using shorter sentences and bullet points as needed.

General Comments

#	Page	Section	THC Comments
18	2–3	Abstract, Segment 3	Before determining that there would be a de minimis impact, state that there would be “no adverse effect” to the historic properties (if that is what you are proposing).
19	3	Property 581	Use “Downtown Houston Post Office, Processing and Distribution Center” as the property name to match the name used in the National Register nomination.
20	3	Property 966	Revise to read, “...and an existing <u>non-historic highway</u> bridge...”
21	3	Property 975	Revise to read, “...previously determined <u>NRHP</u> -eligible...”
22	5	Project Description	Include reference to the realignment of IH 45 here.
23	5	Segment 1	The new right-of-way given at the end of this paragraph (246 acres) does not match the table above or in the Abstract (212 acres). Revise as necessary.
24	6	Segment 2	The new right-of-way given here (44 acres) does not match the table above or in the Abstract (19 acres). Revise as necessary.
25	6	Segment 3	Is the demolition of the Pierce Elevated part of the proposed project? How does this square with the preceding sentence that the “elevated IH 45 roadway along the west and south sides of Downtown would be removed,” if Pierce Elevated remains? If the elevated roadway is essentially abandoned by TxDOT, is it not a reasonably foreseeable effect that the elevated roadway would be demolished, even if by others? The demolition of the Pierce Elevated is referred to in the draft Environmental Commitments in the September 14, 2018 memo from Pat Henry (TxDOT-Houston District) to Renee Benn (TxDOT-Environmental Division).
26	7	APE	Revise to read, “...using an APE of 300' <u>from proposed new ROW</u> ...”
27	7	APE	Spell out “State Historic Preservation Officer” and “Environmental Affairs Division” on first use.
28	7	APE	Correct font change.
29	8	Table 1	The Germantown Historic District was also designated as a local historic district in 2012.
30	8	Table 1	The 1879/1926 Houston Waterworks was also designated as a State Antiquities Landmark in 1981.
31	8	Table 1	The Cheek Neal Coffee Company Building was also designated as a local historic landmark in 2005.
32	9–12	Historic Land Use	This section would benefit from incorporating historic maps and aerial photographs. Historic City of Houston planning documents (master plans, transportation plans, land use plans, etc.) may provide other important context. Similar comments were previously made in our letter of December 12, 2017 and have not been addressed.
33	9–10	Historic Land Use, Segment 1	When was this area annexed into the City of Houston? Although the IH 45 right-of-way is within the Houston city limits, large areas surrounding the IH 45/Beltway 8 interchange remain unincorporated and are served by Municipal Utility Districts. How has this impacted the growth and development of the immediate area, Houston, or Harris County?
34	10–11	Historic Land Use, Segment 2	When was this area annexed into the City of Houston? This segment generally follows Little White Oak Bayou; did the bayou impact the historic land use of the area or the alignment of IH 45? How so?
35	13	Historic Period, Paragraph 2	Revise to read, “...all other <u>historic</u> properties recorded in this report...”

General Comments

#	Page	Section	THC Comments
36	13	Comments on Project Setting, Paragraph 1	This paragraph makes it seem like the City of Houston does not have historic districts at all. The City has many locally-designated historic districts, which require approval of Certificates of Appropriateness. Please revise this paragraph as necessary. Make sure this section is consistent with page 23.
38	15		Page 15 is blank.
39	17	Table 3	Emancipation Avenue is a new enrollee in the Texas Main Street Program. Why was the Emancipation Economic Development Council not included as a potential consulting party or source of further information? This was mentioned previously in our letter of December 17, 2017. Have the Houston Downtown Management District or neighborhood associations within the project area been invited?
40	19	Areas of Significance	Given the concentration of highways and railroads, and the presence of Buffalo Bayou, transportation should be considered a potential area of significance for Segment 3.
41	20	Literature Review	If the historic context of this HRSR is reliant on earlier surveys, those should be incorporated here and made readily available to consulting parties. The 2015 report contains several other historic themes not described here at all. This HRSR should be able to stand alone and provide (or include in appendices) sufficient historic context for anyone to understand how individual properties/districts were evaluated.
42	21	Transportation	What was the start and end of the Central National Road? What was its general route in Harris County? This seems particularly relevant for IH 45. When was US 75 constructed? Who/what was displaced by the mid-century construction of IH 45, IH 610, etc.? When was IH 10 constructed? When was the Downtown Loop constructed? What impacts has road/highway development had on Houston?
43	21–22	Railroads	When did specific rail lines reach Houston? Are there major rail yards that are/were historically significant? Any discussion of public transit, streetcar lines, or light rail?
44	24	Suburban Residential Development	When were residential neighborhoods along Segments 2 and 3 developed? No discussion of the Fifth Ward. In the first full paragraph of page 24, revise the sentence that begins, “It was difficult to for...,” as needed. In the last paragraph, address restrictive covenants as a tool of segregation.
45	26	Rossonian Cleaners	Where was the Rossonian Hotel located? Is it still extant? Are the Cold Storage transom windows gone, or just obscured by the modern awning? The location of the Cold Storage entrance remains in place.
46	26	ID 725/726 (Warehouse, 2105 McKinney Street)	When were the Asian-inspired awnings added? When was this area referred to as China Town? Since no historic context on this area as China Town is provided, how can the conclusion be reached that this property lacks a significant association with China Town. The Sanborn Map excerpt (page 990 of the overall PDF) shows the wrong property. This building is on the 2100 block of McKinney Street, between St. Emanuel and Hutchins Streets; the map excerpted shows the 2200 block of McKinney Street, between Hutchins and Bastrop Street. Is this property actually associated with the Westheimer family, or is that just based on the incorrect Sanborn map? The 1951 Sanborn Map labels this property as the Damon Wells Warehouse and the existing footprint appears to be consistent with the 1951 footprint. Please reevaluate this property within the proper context.
47	27	Effects	Revise the first sentence to make clear that 36 CFR §800 requires the federal agency to involve consulting parties, not just the SHPO.

General Comments

#	Page	Section	THC Comments
48	29	Table 4	If the effects discussion following this table is organized by Segment, the Segment for each historic property should be given in the table.
49	36	Figure 4	The map of the Germantown Historic District does not show the entire extent of the district. Also, see comments about including ID 546 within the boundary of the historic district.
50	94	Maps	The boundary of the Germantown Historic District is incorrectly shown. It should include ID 546 (1212 Wrightwood Street) as a contributing resource.
51	94	Maps	Please indicate the boundaries of the Kenilworth Grove and Birdsall Place neighborhoods, for which an intensive evaluation was performed.
52	94	Maps	The maps do not show the entire extent of the APE. Missing are: the full IH 45/Beltway 8 interchange, the IH 610/Hardy Toll Road interchange, IH 10 west of Houston Avenue, and IH 45 southeast of IH 69. Even if there were no historic-age properties surveyed in these areas, it is helpful to see the full APE.
53	94	Maps	Please include all street names on the maps, or at least those that intersect the APE.
54	94	Maps	Please check the contributing/non-contributing symbology for in the Houston Warehouse Historic District. Not all contributing properties are shown correctly.
55	120	Map 24, Segment 3	THC concurs that the Union Transfer and Storage Building (ID 026, 1113 Vine Street), which was listed in the National Register in 2001, is now outside of the APE for the project. However, given the nature of the design/build process, even minor changes to the project scope or alignment may put it back within the APE.
56	123	Tabular Inventory	It is confusing to have some properties that were evaluated by previous surveys include in the tabular inventory, but not all. Recommend including <i>all</i> properties within the APE in the tabular inventory and noting that the property was previously evaluated where necessary.
57	123	Tabular Inventory	For properties that are within the APE of two segments, it would be useful to duplicate the property record in each segment. For instance, if the segments are divided into separate design/build contracts, each tabular inventory here would contain a complete listing of the surveyed properties.
58	123	Tabular Inventory	Many, many properties are described as “no style” when a short description could be provided.
59		Survey Forms	Where possible, please include the current and historic property name, especially for properties such as churches or commercial buildings.
60		Survey Forms	The standard eligibility justification (“Building does not exhibit any architectural distinction or elements of high style, and the quality of materials and/or workmanship is not substantial enough to merit listing. Additionally, it is not associated with any known significant persons or events”) misrepresents the National Register criteria. Criterion A covers “broad patterns of history;” Criterion C is not limited to “high style;” materials and workmanship are aspects of integrity that should be evaluated after the historic significance is assessed; and, for most properties no indication is given that it was looked at as part of any potential historic district. Similar comments were made previously in our letter of December 12, 2017 and remain unaddressed.

TEXAS HISTORICAL COMMISSION

real places telling real stories

September 9, 2019

Renee Benn
Texas Department of Transportation, Environmental Division
125 East 11th Street
Austin, Texas 78701-2483

Re: Project Review Under Section 106 of the National Historic Preservation Act, North Houston Highway Improvement Project, Historic Resources Survey Report—Update, Determinations of Eligibility and Assessment of Effects, Houston, Harris County (TxDOT/106, THC #201912479, CSJ 0912-00-146)

Ms. Benn:

Thank you for your correspondence of August 18, 2019, transmitting the North Houston Highway Improvement Project (NHHIP) Historic Resources Survey Report—Update prepared by Mead & Hunt, Inc., on behalf of the Texas Department of Transportation (TxDOT). Based on this Update and previous reports, your letter also includes TxDOT's determinations of eligibility for listing in the National Register of Historic Places and assessment of effects on historic properties. This letter serves as comment on the proposed undertaking regarding non-archeological historic resources from the State Historic Preservation Officer, the Executive Director of the Texas Historical Commission (THC); all consultation regarding archeological resources will be coordinated separately.

Overall, we are very pleased to see the additional historic context which allows for a thorough evaluation of the surveyed historic-age resources. We greatly appreciate the efforts made to compile the previous historic resources surveys, summarize the project's consultation record, and address questions raised in previous correspondence from THC and other consulting parties.

Determination of National Register Eligibility

For the purposes of compliance with Section 106 of the National Historic Preservation Act, THC concurs that all of the properties listed in the first table in your letter are listed in, or eligible for listing in, the National Register. Based on all available evidence, THC also concurs that the remaining properties within the project's Area of Potential Effect (APE) are not eligible for listing in the National Register at this time. Unless unanticipated discoveries of additional historic-age properties are made or the project's APE changes, no further identification and evaluation of historic properties is expected.

Although not addressed in this Update, THC recently concurred with your determination that the Goodwill Missionary Baptist Church (3405 Nance Street) is not eligible for listing in the National Register.

Assessment of Effects on Historic Properties

THC offers the following comments on your assessment of the project's effects on historic properties:

Table with 3 columns: Historic Property, TxDOT Effects Assessment, and THC Comments/Concurrence. Row 1: Near Northside Historic District (HD #1), No adverse effect, Concur—Taking of additional right-of-way and demolition of a non-contributing resource will have no adverse effect on the historic district. We look forward to receiving the Section 4(f) evaluation regarding this use of the historic property when available.

Historic Property	TxDOT Effects Assessment	THC Comments/Concurrence
Former Robert E. Lee Elementary School (ID 001, individually NR-eligible and a contributing resource to the Near Northside HD)	No adverse effect	Concur
Former Galveston, Harrisburg, and San Antonio Railroad Hospital (ID 002, individually NR-eligible and a contributing resource to the Near Northside HD)	No adverse effect	Concur
House and Garage , 109 Carl Street (ID 554, a contributing resource to the Near Northside HD)	No adverse effect	Concur—Demolition of the non-contributing Garage and minor right-of-way acquisition will have no adverse effect on the historic House or the Near Northside HD overall.
Germantown Historic District (HD#2)	No adverse effect	Concur, if prescriptives are incorporated into the design/build contract ensuring that the design and location of any noise barrier and high-mast lighting are developed in coordination with the consulting parties.
Houston Warehouse Historic District (HD #3)	Adverse effect (Demolitions)	Concur—Demolition of two contributing resources to the historic district will have an adverse effect on historic properties. We look forward to receiving the Section 4(f) evaluation regarding this use of these historic properties when available.
Reader's Wholesale Distributor's Warehouse (ID 024, individually NR-eligible and a contributing resource to the Houston Warehouse HD)	Adverse effect (Demolition)	Concur
San Jacinto Warehouse (ID 025, individually NR-eligible and a contributing resource to the Houston Warehouse HD)	No adverse effect	Concur, if design prescriptives are incorporated into the design/build contract to avoid any potential adverse vibratory effects.
Walter's Downtown (ID 028, a contributing resource to the Houston Warehouse HD)	No adverse effect	Concur, if design prescriptives are incorporated into the design/build contract to avoid any potential adverse vibratory effects.
Carlisle Plastics Warehouse (ID 029, northern metal building, a contributing resource to the Houston Warehouse HD)	Adverse effect (Demolition)	Concur
Carlisle Plastics Warehouse (ID 030, southern brick building, a contributing resource to the Houston Warehouse HD)	No adverse effect	Concur, if design prescriptives are incorporated into the design/build contract requiring consulting party review of the demolition plans for the adjacent Carlisle Plastics Warehouse (northern brick building, ID 029).

Historic Property	TxDOT Effects Assessment	THC Comments/Concurrence
METRO Transit Authority Building (ID 820, a contributing resource to the Houston Warehouse HD)	No adverse effect	Concur—Minor right-of-way acquisition will have no adverse effect on historic properties.
Third Ward Historic District (HD #4)	No adverse effect	Concur
Hidden Valley Historic District (HD #5)	No adverse effect	Concur
Brooke Smith Historic District (HD #6)	No adverse effect	Concur
1879/1926 Houston Waterworks (ID 004)	No adverse effect	Concur, if design prescriptives are incorporated into the design/build contract to avoid any potential adverse vibratory effects.
Kellum-Noble House (ID 007A)	No adverse effect	Concur
Former Albert Sidney Johnson Junior High School (ID 015)	No adverse effect	Concur
Check-Neal Coffee Company Building (ID 016)	Adverse effect (Property acquisition, but no building demolition)	Concur—Right-of-way acquisition will have an adverse effect on this historic property. Design prescriptives should be incorporated into the design/build contract to avoid or minimize any potential adverse vibratory and soil movement effects. We look forward to receiving the Section 4(f) evaluation regarding this use of this historic property when available.
Myers-Spalti Historic District (ID 017)	No adverse effect	Concur
Houston Fire Station No. 5 (ID 019)	No adverse effect	Concur
Former Phillips 66 Gas Station (ID 0179)	No adverse effect	Concur
Former Downtown Houston Post Office, Processing and Distribution Center (ID 581)	No adverse effect	Concur—Minor right-of-way acquisition will have no adverse effect on this historic property. We look forward to receiving the Section 4(f) evaluation regarding this use of this historic property when available.
Rossonian Cleaners (ID 590)	Adverse effect (Demolition)	Concur—Demolition of all or part of the building will have an adverse effect. We look forward to receiving the Section 4(f) evaluation regarding this use of this historic property when available. Demolishing only the southern half of the building, and preserving the northern half, could potentially minimize harm to the historic property.
Victorian House, 4120 Austin Street (ID 603)	No adverse effect	Concur
Gribble Stamp Company (ID 738)	No adverse effect	Concur

Historic Property	TxDOT Effects Assessment	THC Comments/Concurrence
Butler Brothers Union Terminal Warehouse (ID 908)	No adverse effect	Concur
L-Plan House , 3417 Baer Street (ID 956)	No adverse effect	Concur
Strauss-Bascule Railroad Bridge (ID 966)	No adverse effect	Concur, if design prescriptives are incorporated into the design/build contract to avoid any potential adverse effects during construction.
Judge Hernandez Tunnel (ID 975)	No adverse effect	Concur, if design prescriptives are incorporated into the design/build contract to avoid any potential adverse effects during construction.
Former Crawford Elementary School (ID 981)	No adverse effect	Concur
City Hall Annex (ID 983)	No adverse effect	Concur
Navigation Boulevard Underpass	No adverse effect	Concur

Resolution of Adverse Effects

The proposed minimization and mitigation measures summarized in the second table in your letter appear to be appropriate and we anticipate further developing these measures through continued consultation. We also anticipate further consultation regarding the programmatic agreement for the project and the design/build contract design prescriptives, to ensure that proper measures are in place to prevent additional adverse effects to historic properties.

We look forward to further consultation with your office and hope to maintain a partnership that will foster effective historic preservation. Thank you for your cooperation in this federal review process, and for your efforts to preserve the irreplaceable heritage of Texas. If you have any questions concerning our review, or if we can be of further assistance, please contact Justin Kockritz at 512-936-7403 or justin.kockritz@thc.texas.gov.

Sincerely,



Justin Kockritz, Lead Project Reviewer, Federal Programs
 For: Mark Wolfe, State Historic Preservation Officer

- cc: City of Houston, Historic Preservation Office, *via email*
- Charles Duke and Janet Wagner, Harris County Historical Commission, *via email*
- David Bush, Preservation Houston, *via email*
- David Denenburg, Denenburg Interests, LLC, *via email*
- Kirk Farris, Art & Environmental Architecture, Inc., *via email*
- Thomas McWhorter, *via email*





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February 7 2020

**SECTION 106 REVIEW: DETERMINATION OF NRHP EFFECTS
SECTION 4(f) REVIEW: NOTIFICATION OF INTENT TO RENDER DE MINIMIS SECTION 4(f) FINDING, INDIVIDUAL
SECTION 4(f) FINDING**

Harris County / Houston District
North Houston Highway Improvement Project (NHHIP), Interstate 45
CSJ: 0912-00-146

Section 4(f) properties: De Minimis Properties: Near Northside Historic District, Residence at 109 Carl St (within Near Northside Historic District), San Jacinto Warehouse (within Warehouse Historic District), Walter's Downton/former Bottling Works (within Warehouse Historic District), METRO Transit Building (within Warehouse Historic District), Downtown Houston Post Office

Section 4(f) properties: Individual 4(f) Properties: Reader's Distributors Warehouse (within Warehouse Historic District), Carlisle Plastics Metal Warehouse (within Warehouse Historic District), Cheek Neal Coffee Company Building, Rossonian Cleaners Building

Mr. Justin Kockritz
History Programs
Texas Historical Commission
Austin, TX 78711

Dear Mr. Kockritz:

Regulatory Environment and Introduction

The environmental review, consultation, and other actions required by applicable Federal environmental laws for this project are being, or have been, carried out by TxDOT pursuant to 23 U.S.C. 327 and a Memorandum of Understanding dated December 9, 2019, and executed by FHWA and TxDOT. As a consequence of these agreements, TxDOT's regulatory role for this project is that of the Federal action agency. In accordance with 36 CFR 800 and our Section 106 Programmatic Agreement for Transportation Undertakings (2015), this letter continues Section 106 consultation on final effects of the proposed undertaking with respect to historic properties located within the project's area of potential effects (APE).

In December 2016, May 2017, November 2017 and October 2018 the Texas Department of Transportation (TxDOT) coordinated this project with your office regarding eligibility of known or previously designated historic properties in the APE. These consultations resulted in questions raised by the SHPO. TxDOT conducted final determinations of eligibility with SHPO in September 2019. At this time, TxDOT seeks to finalize determinations of effect.

Project Description

The Texas Department of Transportation (TxDOT) is proposing improvements to create additional roadway capacity to manage congestion, enhance safety, and improve mobility and operational efficiency on Interstate Highway 45 (IH 45) from U.S. Highway 59 (US 59)/IH 69 to Beltway 8 North, including improvements along US 59/IH 69 between IH 45 and Spur 527 in Harris County, Texas.

The proposed project is broken into three contiguous segments and within each of those segments TxDOT considered three alternatives (for a total of nine alternatives). TxDOT, with public input, identified the preferred FEIS alternative as Alternative 4 for Segment 1, Alternative 10 for Segment 2, and Alternative 11 for Segment

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OUR MISSION: *Through collaboration and leadership, we deliver a safe, reliable, and integrated transportation system that enables the movement of people and goods.*

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3. The majority of the historic properties are located along Segment 3. TxDOT completed a full historic resources survey of the preferred FEIS alternative for this project and coordinated that survey with consulting parties in 2019.

APE

TxDOT consulted with SHPO and determined the APE is the existing ROW where no new ROW is proposed; and 150' from proposed new ROW and easements and in areas of any newly proposed elevated structures which would represent a grade increase of at least 5' or more from the ground level. Additionally, in informal coordination with SHPO, TxDOT determined an APE of 300' from proposed ROW in areas with a newly proposed grade increase of at least 10', areas of a proposed multi-level or elevated component, such as a flyover, and other certain high probability areas.

Determination of Eligibility

On September 9, 2019 THC concurred with TxDOT on determinations of eligibility for properties in the APE for this project (see attached letter).

Segment 3 of this project in downtown Houston is a design-build project, where TxDOT provides the schematics to the bidding contractor with restrictions and prescriptives. TxDOT ENV will work closely with TxDOT's design build office as this project proceeds. The contractor must commit to building the project in the schematics as they are shown in this coordination and on the project website at <http://www.ih45northandmore.com/>. The design build office will notify TxDOT ENV of any changes to these schematics in vicinity of historic properties so that proper coordination with consulting parties and SHPO can occur if warranted. A copy of the design build contract and the prescriptives contained therein for historic properties is attached.

Consultation with Other Parties

All consulting parties reviewed this project; this is the final opportunity to comment on effects of the project. We request all parties review this 4(f) analysis concurrently with your office within a 20-day review period.

The Advisory Council for Historic Preservation (ACHP) chose to participate in consultation for this project. At the request of the ACHP, TxDOT developed a Programmatic Agreement (PA) for effects to historic properties for this project in consultation with their staff, that of the THC and consulting parties. Efforts to finalize this draft agreement are still pending additional feedback from these parties. As drafted, the PA embeds the prescriptives for the design build contract to codify commitments to avoid and minimize harm to historic properties.

Determination of Cumulative Effects

TxDOT made determinations of effect for historic properties based on the FEIS preferred alternative and determined that there are no adverse cumulative effects to historic properties. Adverse effects to historic resources as a result of this project have been minimized with careful planning and will be mitigated. TxDOT developed programmatic approaches to mitigation, including a historic resources survey of East Downtown as mitigation for the adverse effect to the Warehouse District and the Cheek-Neal Building. Project components have the potential to improve connectivity in project area historic districts. This project does not represent a deviation from the past, present, or anticipated future trends of development in the downtown area and would not significantly change the historic character of downtown Houston. Furthermore, future developments with potential to affect historic properties would be subject to compliance with applicable federal, state and local regulations.

Determination of De Minimis Finding- No Adverse Effect

As part of this coordination, TxDOT determined that the proposed project meets the requirements for Section 4(f) *de minimis* impact findings under 23 CFR 774 for six properties (see chart below). TxDOT based its determination on the fact that the use for the properties amounts to less than 10% of the properties' overall acreage and the project will have **no adverse effect** on the NRHP-eligible properties. The function of the properties will not be impaired, nor will it cease. This *de minimis* finding does not require the traditional

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second step of including all possible planning to minimize harm because avoidance, minimization, mitigation, or enhancement measures are included as part of this determination.

Property #	Name	Pages of HRSR with de minimis details
HD #1	Near Northside Historic District	204-208
554 (in HD #1)	Residence at 109 Carl St (within Near Northside Historic District)	212-214
025	San Jacinto Warehouse (within Houston Warehouse Historic District)	187-190
028	Walter's Downton/former Bottling Works (within Houston Warehouse Historic District)	191-195
820	METRO Transit Building (within Houston Warehouse Historic District)	200-203
581	Downtown Houston Post Office	230-232

Determination of Individual 4(f) finding- Adverse Effect

These properties were subject to individual 4(f) analyses. SHPO, stakeholders, and consulting parties concurred or did not comment on mitigation for adverse effects in September 2019.

Property #	Name	NRHP Criterion	Effect Determination	Proposed Mitigation
HD #3	Houston Warehouse Historic District, roughly bounded by railroad to the north, McKee St to the east, railroad track/Buffalo Bayou to the south, Vine St/Buffalo Bayou to the east. Seven contributing properties within APE.	NRHP-eligible, A & C	Adverse effect due to removal of two contributing properties within.	Possible documentation of East Houston warehouse area
024 (in HD #3)	Reader's Wholesale Distributor's Warehouse, 1201 Naylor St	Individually NRHP-eligible, C Contributing to potential Houston Warehouse Historic District	Adverse effect (demolition)	Documentation of property, possibly including interior
029 (in HD #3)	Carlisle Plastics Metal Warehouse, 1110 Naylor	Contributing to potential Houston	Adverse effect-resource to be demolished	Documentation of property, possibly

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		Warehouse Historic District		including interior
	Properties determined individually eligible for NRHP-listing			
016	Cheek-Neal Coffee Company Building, 2017 Preston Ave	NRHP-listed, 2016	Adverse effect, ROW purchase	Documentation of east side of Houston in this area- warehouses and industrial
590	Rossonian Cleaners, 3921 Alameda	C, architecture and A, community development	Adverse effect, partial demolition of property caused by ROW acquisition	Documentation of property prior to demolition, history of property and Alameda commercial area of Houston

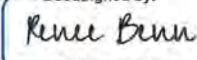
Conclusion

In accordance with 36 CFR 800 and our Section 106 Programmatic Agreement for Transportation Undertakings, I hereby request your signed concurrence with TxDOT's findings of **NRHP effect**. We additionally notify you that SHPO is the designated official with jurisdiction over Section 4(f) resources protected under the provisions of 23 CFR 774 and that your comments on our Section 106 findings will be integrated into decision-making regarding prudent and feasible alternatives for purposes of Section 4(f) evaluations. Final determinations for the Section 4(f) process will be rendered by TxDOT pursuant to 23 U.S.C. 327 and the aforementioned MOU dated December 9, 2019. If we do not hear from you within our Section 106 PA 20 day review period, we will assume you concur or have no comments on these findings

The PA for this project will be sent to your agencies soon and we will be in touch to set up a meeting to discuss timelines.

Thank you for your cooperation in this federal review process. If you have any questions or comments concerning these evaluations, please call me at (409) 898-5717.

Sincerely,
Signed by:


Renee Benn

Historic Preservation Specialist
Environmental Affairs Division



thru: Bruce Jensen, Cultural Resources Section Director

cc: Thomas McWhorter, Individual Consulting Party
David Denenburg, Individual Consulting Party
Kirk Farris, Individual Consulting Party

NHHIP 45 CSJ: 0912-00-146

5

February 2020

CONCURRENCE WITH NON-ARCHEOLOGICAL SECTION 106 FINDINGS OF NRHP EFFECTS

NAME: Mark Wolfe DATE: 2/27/2020
for Mark Wolfe, State Historic Preservation Officer

NO COMMENTS ON DETERMINATION OF DE MINIMIS IMPACT UNDER SECTION 4(F) REGULATIONS

NAME: Mark Wolfe DATE: 2/27/2020
for Mark Wolfe, State Historic Preservation Officer

NO COMMENTS ON DETERMINATION OF INDIVIDUAL IMPACT UNDER SECTION 4(F) REGULATIONS

NAME: Mark Wolfe DATE: 2/27/2020
for Mark Wolfe, State Historic Preservation Officer