

# HUBER THOMAS

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**Via Email ([arturo.michel@houstontx.gov](mailto:arturo.michel@houstontx.gov))**

Mr. Arturo Michel  
Houston City Attorney  
City of Houston Legal Department  
P.O. Box 368  
Houston, TX 77001-0368

RE: Austin Street Construction Closure in Houston, Texas

Dear Mr. Michel:

I write to provide actual notice to the City of Houston of a premises hazard that is created by closing Austin Street for construction (photos included below). As you likely know, Austin Street, which includes a bi-directional protected bike lane, is closed due to construction between Gray Street and Pierce Street. Austin Street is a critical link in Houston's bike network — the only bi-directional, north-south bikeway on the Downtown/Midtown street grid. This street is widely used by people who commute by bike to jobs and other destinations in Downtown Houston.

Currently, there is no safe accommodation for people commuting by bike. The lack of safe accommodations for people on bikes is a clear violation of the City of Houston's Infrastructure Design Manual (IDM). The IDM section 17.2.03 states: "Temporary traffic control must be provided for all pedestrian and bicyclists that are impacted or obstructed." Below please find a link to this manual: <https://www.houstonpermittingcenter.org/media/6371/download?inline#page=596>

Therefore, in the interest of ensuring the safety of all bicyclists who rely on this route, we formally urge the City of Houston to take immediate action to remedy this obstruction following the guidance in section 17.2.03 of the Infrastructure Design Manual (IDM).

Should you wish to discuss any of the above items in this letter with me, please contact me via email ([charlie@huberthomaslaw.com](mailto:charlie@huberthomaslaw.com)) or at 504-274-2500. Otherwise, I appreciate and thank you for your prompt attention to this matter.

With best regards, I remain,

Sincerely,



Charles M. Thomas

CMT/vmb  
cc: [info@bikehouston.org](mailto:info@bikehouston.org)

