



November 18, 2015

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Re: MoPac South Project

Dear Sirs:

This letter provides our comments on the materials, presentations, and statements of the Central Texas Regional Mobility Authority ("CTRMA") and its representatives related to the CTRMA's October 21, 2015 presentation to the Rollingwood City Council, the CTRMA's October 22, 2015 Rollingwood Area Workshop, the CTRMA's November 10, 2015 MoPac South Environmental Study Open House, and the CTRMA's MoPac South Environmental Study Virtual Open House, which was launched online on October 21, 2015.

We would first like to briefly respond to the CTRMA's August 6, 2015 letter, which was sent from Mike Heiligenstein to Mayor Farrell. Thank you for noting that you "appreciate the City's support for mobility and safety improvements to the MoPac South corridor and your willingness to partner with us as we further develop our Express Lanes alternative." We appreciate your ongoing communication and your desire to partner with us as you develop the plans for the MoPac South Project (the "Project") and conduct the Environmental Study for the Project in accordance with the National Environmental Policy Act ("NEPA").

We were, however, a bit puzzled by the following statement contained in the CTRMA's August 6 letter: "While I understand your concerns regarding the elevated lanes, if the original MoPac had never been built due to similar concerns, we would have had an additional 150,000 vehicles winding their way through neighborhoods and city streets on their way to downtown and area employment centers." We have consistently voiced our support for needed improvements to MoPac South that serve to increase mobility and safety, while being sustainable and sensitive to both the human and natural environment. As we have stated, Rollingwood supports a sustainable solution to improve mobility and safety, and has previously expressed its support for a number of aspects of the Project, including improved traffic flow on MoPac near the City, and increased safety at the entrance and exit ramps to and from FM 2244. However, we want to make sure that the design of the roadway does not repeat the mistakes of the past in ways more fully discussed below.

In addition, the CTRMA's August 6 letter states that: "You are correct to point out that CAMPO supports the two express lanes in each direction — in fact it was a unanimous vote." It is important to keep in mind that the CAMPO 2035 Regional Transportation Plan included only one express lane in each direction for MoPac. The CTRMA requested an amendment to the CAMPO 2035 Plan, which would have changed the scope of the MoPac South project in the CAMPO 2035 Plan from one express lane each direction to two express lanes each direction, and which would have aligned the CAMPO 2035 Plan with the CTRMA "Preferred Alternative". The proposed amendment to the CAMPO 2035 Plan was withdrawn on or about March 30, 2015. The CAMPO 2035 Plan still contains one express lane in each direction for MoPac; however, the CAMPO 2040 Plan, which was adopted by unanimous vote, does include two express lanes in each direction.

**The City of Rollingwood does not support elevated lanes of any kind over MoPac.**

Cities across the country are actively addressing the negative impacts associated with urban elevated highways. These elevated highways were designed and built during the 1950's, 1960's, and 1970's in an effort to move people living in suburban areas to downtown centers. Cities like New York, Milwaukee, Portland, and San Francisco have all torn down and redesigned elevated urban highways and overpasses in order to improve livability, aesthetics, noise, and transportation. Right here in Texas, both Dallas (I-345) and Houston (I-45 Pierce Elevated) are actively engaged with TxDOT in planning efforts to remove elevated portions of highways that are eyesores, divide neighborhoods, create noise and light pollution, are expensive to maintain, and add little or no transportation efficiency.

Our City and the greater Austin community values and wants to preserve and promote what are our innate strengths in this unique area: walkability, urban parks, bike paths, and the clustering of many different uses close together. With this in mind, we are keenly aware that the noisy, hulking presence of an elevated urban highway, or elevated toll lanes, will only degrade the value of what is perhaps the greater Austin community's most unique, valued and productive land. In this irreplaceable setting, elevated, limited-access toll lanes connecting to downtown, with their small number of entry and exit points, will not move car traffic any more efficiently during rush hour than does the two-express lane option without elevated, direct connect toll lanes, with its multiplicity of route options. In addition, due to its elevated nature and small number of entry and exit points, the elevated, limited-access toll lanes connecting to downtown does not serve to facilitate reliable emergency response in any way.

Elevated "double decker" lanes directly adjacent to Zilker Park and spanning over Lady Bird Lake will soar approximately 45 to 50 feet above ground level and will destroy the viewshed and natural beauty of this special and unique part of the Austin area. It will also adversely impact historic properties, most notably the Zilker Park Historic District, and will transform the character, look and feel from peaceful and green to austere and industrial. In addition to being an eyesore, elevated toll lanes over MoPac will almost certainly increase noise and light pollution to the Zilker Park Historic District, the Nature and Science Center, Zilker Botanical Gardens, Deep Eddy Pool, Lady Bird Lake, Austin High School, and nearby parks and residential neighborhoods, including Rollingwood Park and the City of Rollingwood.

Likewise, the newly introduced proposal to add two, elevated "wishbone" tolled lanes which also would soar 40 to 50 feet above ground level are not a viable alternative. Like the original double decker design over Zilker Park and Lady Bird Lake, these alternative "double decked" lanes over MoPac will also be an eyesore, will create an austere and industrial feel in this area, and will almost certainly increase noise and light pollution directly to nearby parks and residential neighborhoods, including Rollingwood Park and the City of Rollingwood. Shifting the elevated toll lanes to the south will not improve or overcome all of the negative impacts that will result. In addition, this design will cost an additional \$30 million over and above the two express lane design without elevated, tolled lanes and will not achieve any real benefit to justify either the financial cost or the significant impacts to the human and natural environment.

Throughout the initial MoPac South environmental planning process, the CTRMA has promoted its use of a "Context Sensitive Solutions (CSS) process" to ensure that "any mobility improvements not only meet the needs of the community they serve, but fit into the physical setting while reflecting the unique features and characteristics of the project area." According to the CTRMA's materials, CSS is a collaborative approach to develop transportation facilities that fit within its surroundings." In addition, the CTRMA touts that CSS "is an approach that **leads to preserving and enhancing scenic, aesthetic, historic, community and environmental resources**, while improving or maintaining safety, mobility and infrastructure conditions." (emphasis added). Both of the elevated toll lane proposals will directly conflict with the physical setting and destroy the unique features and characteristics of the project area. They will also diminish or destroy the scenic, aesthetic, historic, community and environmental resources of this special area. For these reasons, the CTRMA should not pursue either of the elevated toll lane proposals as a preferred alternative.

As we indicated in our previous correspondence, the City still believes that a “direct connect” to or from Cesar Chavez via elevated lanes will not improve traffic flow into or out of downtown Austin, or on MoPac, and has not been provided with any relevant 2040 traffic studies that demonstrate otherwise. Travis County and the City of Austin do not appear to have any plans to make improvements to Cesar Chavez, meaning a tolled “direct connect” to Cesar Chavez will likely only serve to increase traffic problems near Austin High School. In addition, the entire notion of elevated, tolled lanes directly connecting to Cesar Chavez appears to be contrary to the vision that the City of Austin has for the downtown area. The City of Austin has consistently promoted a denser downtown with an increased number of housing units in the urban core, while emphasizing walkability and bicycling. At the same time, the City of Austin has been reducing or eliminating the amount and availability of public parking in downtown Austin. With this in mind, it seems rather counterintuitive to put any priority on designing and potentially building elevated, limited access, direct connect toll lanes for private vehicle traffic to go directly downtown when the policy of the City of Austin appears to prioritize a reduction in the amount of private vehicles downtown.

**The two express lanes alternative with no elevated, direct connect lanes to downtown is the best option that has been presented by the CTRMA.**

The alternative which contains two express toll lanes each direction without “double decker” elevated lanes should be the preferred option at this time. It is the option which fully meets all of the MoPac South project "goals and objectives" while having the fewest adverse impacts to the human and natural environment. It will have significantly less impact to historic sites, Zilker Park, schools, and neighborhoods than either of the double decker options while still significantly improving travel times and capacity on our roadway with estimated 2035 travel times that are within minutes of either of the double decker options. This alternative will also undoubtedly result in significantly less public controversy and “push back” from nearby neighborhoods, businesses, and residents specifically because elevated freeway lanes are not part of the design.

This alternative is also fully consistent with the CAMPO 2040 Regional Transportation Plan. The CAMPO 2040 plan does not include the provision of direct, tolled access into downtown as a goal. Likewise, the provision of direct, tolled access into downtown is not part of the purpose or need for the MoPac South Project. In addition, this alternative is also more fiscally responsible because it will cost an estimated \$30 million less than the elevated “wishbone” concept and an estimated \$40 million less than the double decker over Lady Bird Lake concept, while achieving similar results in transportation efficiency. This alternative will provide tolled express lane users and emergency vehicles plenty of time and ability to safely maneuver and exit downtown.

In contrast to the alternatives which employ elevated toll lanes, the two toll lanes alternative without any elevated lanes much better meets the stated goals of the CSS process. This alternative will meet the needs of the Austin area community they serve, but also fit into the physical setting while reflecting the unique features and characteristics of the project area. In addition, this alternative does a much better job of preserving and enhancing scenic, aesthetic,

historic, community and environmental resources, while improving or maintaining safety, mobility and infrastructure conditions.

**CAMPO and its consultants should use 2040 traffic data to analyze the alternatives and their impacts to the human and natural environment.**

During this initial phase of this planning process for MoPac South, CTRMA and its consultants have used various different traffic studies to analyze the alternatives and forecast anticipated travel times. Most recently the CTRMA utilized a draft 2020 downtown study performed by the University of Texas to evaluate the various alternatives and forecast travel times. In addition, the CTRMA has at times been utilizing “2015 Bluetooth Data” provided by CDM Smith to evaluate the alternatives. We have serious reservations regarding the use of these studies to analyze the various alternatives. This is especially true in the case of the 2015 Bluetooth Data. This sort of data should not be utilized in any manner to analyze alternatives or forecast travel times because it is heavily skewed for a variety of reasons, not the least of which is the fact that the data is being gathered during a time in which significant traffic delays on MoPac South are being caused by the ongoing construction on the MoPac North Project.

In addition, the CTRMA has been using 2035 traffic data to analyze the alternatives and forecast travel times, which was evident at both the February 2015 Open House and at the November 2015 Open House. As noted above, the CAMPO 2040 Plan is now being utilized as the basis for the purpose and need for the MoPac South Project. As such, the analysis of the project should fully include all traffic impacts from all of the roadways contained in the CAMPO 2040 Regional Plan, including any roads which will serve to connect I-35 and MoPac. In addition, all analysis and forecasted travel times should employ the use of 2040 traffic data in order to be complete, accurate, and fully transparent to the public.

On a related note, the traffic data used on the "baseball cards" distributed by the CTRMA at the City of Rollingwood Workshop contained inaccurate information regarding travel times. The CTRMA staff and consultants initially speculated that the inaccurate information was likely the result of a rounding error, and then later indicated that it was likely an error that was made when the data was incorporated into the marketing and graphic materials.

**High Occupancy Vehicle (HOV) and transit only lanes need to be studied and objectively evaluated.**

The CTRMA has not done any evaluation regarding what the anticipated forecasted travel times would be for alternatives employing HOV, transit only lanes, or additional free lane capacity. The CTRMA has apparently based the decision not to analyze these alternatives on their position that no regional funding is available for this Project to provide free lanes. As noted above, the goals and objectives of the MoPac South Project are to ease congestion and provide relief for all roadway users. Under NEPA, the CTRMA should rigorously explore and objectively evaluate all reasonable alternatives, including alternatives employing HOV, transit only lanes, or additional free lane capacity. In addition, the CTRMA should devote substantial treatment in detail to each alternative that employs HOV, transit only lanes, or additional free lane capacity so that reviewers may evaluate their comparative merits against the other

alternatives that have been proposed. Finally, the alternatives which would employ HOV, transit only lanes, or additional free lane capacity should be included even if they are not within the jurisdiction of the CTRMA for funding or other reasons.

We therefore ask that the CTRMA rigorously explore and objectively evaluate alternatives employing HOV, transit only lanes, and additional free lane capacity. In addition, the HOV and transit only lanes should be compared with the toll and general purpose lane options as part of the environmental study. This is especially true in light of the fact that 2040 traffic data should be employed, and there now appears to be additional regional funding available to fund the construction of roads that are free to the public.

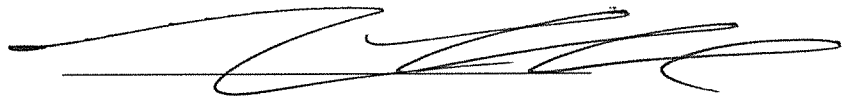
**The City of Rollingwood supports a multi-use path on the west side of the MoPac access road.**

The City fully supports the addition of a multi-use path to be located on the west side of the MoPac access road, from Lady Bird Lake to Barton Creek Mall. However, instead of the proposed 8-foot wide sidewalk, the City proposes the construction of a 11-foot wide multi-use path designed to accommodate both bicyclists and pedestrians, and which will seamlessly connect with Phase III of the MoPac bicycle and Pedestrian project.

Finally, we look forward to continuing to work closely with the CTRMA, as well as other state and local governmental officials and employees to fully participate in the NEPA planning process for the MoPac South Project.

Please continue to keep us informed about the next NEPA Technical Working Group meeting, as well as any additional Open Houses or other public meetings scheduled for this important Project.

Sincerely,



Thom Farrell, Mayor  
City of Rollingwood