



January 7, 2022

Mr. James Bass
Executive Director
Central Texas Regional Mobility Authority
c/o MoPac South Environmental Study
3300 N IH-35, Suite 625
Austin, TX 78705

RE: Official Public Comment on the MoPac South Environmental Study Virtual Public Meeting Number Five

Dear Mr. Bass:

Thank you for the opportunity to comment on the documents provided at Virtual Public Meeting Number Five for the MoPac South Project. The following comments are based on our review of these documents and the CAMPO 2045 Transportation Plan (2045 Plan) and are made in addition to numerous comments, official city actions, official resolutions, and personal engagement by multiple elected officials to both CTRMA and CAMPO over the past six and a half years.

Although little evidence exists as to the consideration or incorporation of any of our previous comments into your current plans, the City wishes to maintain its robust historic record on this issue and trusts that your full review of our previous communications will lead to a more collaborative approach going forward. While the City does not wish to restate each of its earlier comments at length, we enclose all correspondence since April of 2015 and incorporate the same by reference herein for inclusion in the record of comments for Open House Number Five (see Appendix A for all enclosures). Additionally, because CTRMA has not updated the project materials since they were released to the public in 2015, the City's earlier comments are still apposite and have yet to be addressed.

While the City of Rollingwood appreciates CTRMA's efforts to restart the MoPac South Environmental Study, it shares the concerns, expressed by Travis County and others, that it is difficult to meaningfully comment on outdated information. Indeed, because CTRMA has not updated the MoPac South alternatives in over five years, and because some of the existing alternatives do not comply with the 2045 Plan, the City cannot comprehensively address the current alternatives, or their satisfaction of the criteria established by CTRMA. Similarly, although CTRMA has indicated that it will select a preferred alternative based on new data, it has not

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publicly released that data such that the City has had no opportunity to review and incorporate any new data into its comments.

Accordingly, to meet the current deadline, the City submits the following comments based on the information it has at this time. However, because the available information is inherently incomplete, the City requests more detailed information and additional time to comment so that we, as a community, can engage with CTRMA staff on the project. Without this additional time and information, the City, along with other public stakeholders, are placed at the distinct disadvantage of having to comment without knowing what, exactly, they are commenting on.

Compliance with CAMPO 2045 Plan

First, the CAMPO 2045 Plan requires that the MoPac South Project have two express lanes in each direction on MoPac, from Cesar Chavez to Slaughter Lane. Only alternatives 2A, 2B, and 2C are consistent with the 2045 Plan because alternatives 1A, 1B, and 3 (the City of Austin proposal) only have one express lane in each direction.¹ However, the Open House Number Five documents state that all six variations of the express lane alternatives are under evaluation and that “project data is required to be evaluated against the most recent Regional Transportation Plan, which is CAMPO 2045.” This raises the following questions:

- Is it CTRMA’s intent to re-evaluate all six express lane alternatives, even though the 2045 Plan requires two express lanes in each direction?
- Or are alternatives 2A, 2B, and 2C the only 2045 Plan-compliant alternatives (assuming the facts in the footnote below)?
- To the extent any new analysis or data for any of the alternative plans exist, we respectfully request copies so that we may study them in greater detail.

The 2045 Plan also requires the construction of an auxiliary lane on southbound MoPac from the RM 2244/Bee Caves Road entrance ramp to the southbound Loop 360 exit ramp, including an acceleration lane. This appears to require two additional lanes—an auxiliary lane and an acceleration lane.² However, none of the proposed plans show these required lanes and how they will fit into the overall plan that is adopted.

- Will additional right-of-way be required to construct the auxiliary and acceleration lanes and what will their configuration be?
- Do all six alternatives include these additional lanes?
- Are there any schematics that show these lanes?

¹ Even alternatives 2A, 2B, and 2C do not technically comply with the 2045 Plan because the proposed two express lanes only extend from Slaughter Lane to Barton Skyway, not to Cesar Chavez. But, based on the information we have before us, we are presupposing this is either an error in the presentation materials or will be corrected at some future date.

² These terms are often used interchangeably, and it is unclear what exactly is required by the 2045 Plan in this regard.

Second, the Past Events information contained on the MoPac South website includes links to detailed schematics presented in Open House Number Four. It also includes the following statement:

NOTE: Project materials, schematics, cost estimates, and other data linked below were developed in 2015 and have not been updated since. Updated materials will be provided virtually at Open House 5 beginning Nov. 22, 2021.

However, we have been unable to locate any updated schematics for the six alternatives, and the existing schematics contain very little detail with respect to geometrics.

- Will the detailed schematics presented in Open House Number Four be utilized for the updated analysis based on the 2045 Plan travel demand model?
- If not, we request copies of any new schematics. We also request that any updated schematics show the interconnection with the MoPac North Project, as it is currently constructed, as well as the proposed design and connection of Cesar Chavez to MoPac North when constructed.

Efficient Functioning of the Bee Cave (RM 2244) Intersection

The City reiterates its comments from the enclosed letter that the design of the MoPac South Project should ensure that the RM 2244 intersection with MoPac functions efficiently, and that the design does not preclude making improvements to the existing operation in the future. Such improvements may include widening the RM 2244 and MoPac frontage road approaches to better accommodate projected demand for travel west on RM 2244. The City has been in discussions with TxDOT concerning improvements to RM 2244, and it would be beneficial to all entities involved that we work together towards a long-term vision.

As we have previously stated, RM 2244 is a vital corridor for the City of Rollingwood and contains all of the City's commercial properties, which provide vital sales tax revenue. Additionally, the City is aware of and is sensitive to the needs and concerns of our faith-based community partner who owns property along the frontage road and adjacent to this key intersection. Any change to the RM 2244 intersection will have a direct and dramatic impact on the City and its residents. Therefore, we request that the MoPac South plan evaluation criteria include consideration of the need for upgraded intersections along MoPac South, such as RM 2244, Rollingwood Drive, and Barton Springs Road.

Significantly, the Open House Number Five documents do not include any schematics showing the intersection of RM 2244/Bee Caves Road. At one time, there was a proposal to close the intersection of RM 2244 at MoPac so that all eastbound traffic from RM 2244 would be required to turn south along the MoPac frontage road and complete a U-turn at Barton Skyway in order to proceed north along MoPac and the frontage road (the "right-in, right-out" option). The Open House Number Five documents do not show that as a proposed option, but they also do not negate it.

- Is there a plan to change the intersection of RM 2244 at MoPac? If so, please provide any detailed plans that are under consideration.
- Has there been any consideration to how changes to the RM 2244 intersection could impact traffic along Rollingwood Drive (for example, people may use Rollingwood Drive as a cut-through to avoid the RM 2244 intersection)? If so, we would appreciate copies of any such study.

The City of Rollingwood continues to oppose dramatic changes to the RM 2244 intersection, including the diverging diamond and continuous flow options that have been previously discussed. This intersection is the gateway to our City, how most of our citizens exit to go to work, and it is the center of our commercial tax base. Working together and establishing an efficient design for the RM 2244 intersection is vital to the City of Rollingwood.

The City of Rollingwood Opposes Elevated Lanes over MoPac and Elevated Ramps near Barton Skyway.

The City supports improvements to MoPac South that serve to increase mobility and safety; however, we oppose roadway designs that place elevated lanes over MoPac (e.g., Alternatives 2A and 2C). As we stated in the November 2017 letter, elevated lanes increase noise, are unsightly, and are currently being removed throughout the State of Texas, with I-35 in downtown Austin being the most recent example. Elevated lanes would not only affect the quality of life in Rollingwood, they would also negatively impact Zilker Park, the Zilker Park Club House, and Barton Springs.

Likewise, the City of Rollingwood opposes elevated ramps near Barton Skyway in a wishbone configuration (e.g., Alternative 2C). Although we have not had an opportunity to review CTRMA's updated plan, data, or traffic modeling, the City is unconvinced that the wishbone alternative with elevated ramps at Barton Skyway would improve traffic flow into or out of downtown. Instead, it appears from the preliminary sketches that the proposed configuration would conflict with general traffic using the northbound MoPac entrance ramp to the north of the Bee Cave intersection and the southbound MoPac exit ramp to the north of the Bee Cave intersection. We believe this could actually exacerbate traffic problems associated with these ramps rather than improving them.

The City of Rollingwood instead continues to support an alternative, such as 2B, that contains two express toll lanes in each direction without elevated lanes or a direct connection to downtown. As we have expressed before, and again without the benefit of updated traffic modeling, we are concerned the travel time comparisons between options 2B and 2C are not a fair comparison because the wishbone configuration has been optimized in several ways in which the two express toll lanes alternative has not. Thus, while CTRMA's current materials suggest an estimated travel time of 9 minutes—compared to 13 minutes for the non-elevated, two toll-lane alternative—the City believes that, properly optimized as set forth in the November 2017 letter, both options would produce comparable travel times.

The City also continues to support the development of an alternative design for Mopac South incorporating an express lane underpass design between RM 2244 and Barton Springs Road, which would mirror the express lane underpasses that were constructed as part of the MoPac North Project. Underpass lanes are both less expensive to construct and reduce road noise pollution. The City also supports the cantilever design currently being considered for the I-35 project between Airport Boulevard and Martin Luther King Drive.

Finally, the City reiterates the comments, as detailed in the enclosed letter, that CTRMA should (1) update all proposed alternatives for the MoPac South Project to show interconnection with the MoPac North Project and (2) implement bicycle and pedestrian infrastructure to provide consistent, direct access to and from downtown Austin as part of the MoPac South improvements.

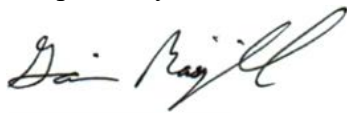
Additional Open House and Opportunity to Comment

The City of Rollingwood joins Travis County in its request that CTRMA repeat the virtual open house process once it has provided updated data, modeling, and information regarding all of the alternatives to the public. This will allow the City, and others, to offer complete and specific comments and will ensure that CTRMA is able to select a preferred alternative based on informed, data-based public input rather than assumptions and speculation on outdated information.

Once again, the City of Rollingwood appreciates CTRMA's efforts in conducting this process and working toward improved mobility for all of the MoPac stakeholders. The City recognizes the need for improvements to MoPac, supports the goal of improving vehicle, bike, and pedestrian traffic in the area, and looks forward to continuing to work with CTRMA, CAMPO, and TxDOT to accomplish those goals.

Should you have any questions, please do not hesitate to contact me.

Respectfully,



Gavin Massingill
Mayor
City of Rollingwood

APPENDIX A



CITY OF ROLLINGWOOD
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04/01/15

Capital Area Metropolitan Planning Organization
Board of Directors
P.O. Box 1088
Austin, Texas 78767

Sent Via Certified Mail
Sent Via Email

Sirs/Madams:

The City of Rollingwood Council Members and myself have attended, participated, and listened to citizens' comments at the Public Hearings and have considered the proposed double-decked expansion at a public hearing of the City Council held on March 11, 2015. The consensus that has resulted from these meetings is that the City Council Members and I have very strong objections to the current MoPac South Expansion Project plans. Please add these comments to the public comments for the CAMPO 2035 and 2040 plans.

The following is a summary of the Pros and Cons concerning the proposed plans:

Pros

- Improve traffic flow will benefit uses of MoPac entering and exiting at the City.
- The proposed exit ramp onto Bee Caves Road would improve the dangerous existing ramp.
- Possible improvement to the Rollingwood Drive/MoPac intersection are desired.
- Possible improvement to the Bee Caves Road/MoPac intersection are desired.
- Possibilities for improvements/developments to the Hike and Bike trails would be beneficial.

Cons

- Noise levels will significantly increase from the proposed elevated lanes.
- Light pollution will significantly increase from the proposed elevated lanes.
- Use of park areas by youth sports teams and the public and park development will be negatively impacted.
- The proposed MoPac connection to I-35 is not being discussed in the plan, and would adversely impact Rollingwood with increased traffic on MoPac.
- Ingress/Egress "short window" access for Express Lanes at Barton Skyway and Hwy. 360.
- The necessity of traveling south to Barton Skyway to reach Express Lanes from the City.

- Lack of an entry/exit point feasibility study.
- Proposed Bike/Pedestrian lane plan is not considered to be safe or rational.
- Residents' views of downtown Austin will be obstructed.
- An upper deck and exit located in the immediate vicinity of Austin High School is believed to be an undesirable infringement on the school.
- It is believed that the plan for northbound lanes to merge to one lane will result in an increase in traffic congestion at the point of merger and backing up from that point.
- The project's plans for access to and from Cesar Chavez Street may not be sufficient to address the increase of 15,000 workers from two new developments in that area and any new plan should provide for additional traffic capacity on Cesar Chavez Street, particularly at Lamar Street Bridge, into the downtown area.

As stated, these are only a summary of the issues and comments that have been made by City Council members and myself, and are further based on concerns voiced by residents of the City. As for noise and light pollution and the visual impact, no one can recall a double-decked highway in a vicinity like ours, where the location of homes and parks on the immediately surrounding hills will suffer the effects all the more, being on more of an even elevation with the elevated highway.

The City of Rollingwood's City Council Members and myself appreciate the traffic reduction efforts of CAMPO and the opportunity to provide input to the project's plan. We sincerely hope that such input is seriously considered to develop a final plan that is publicly acceptable as well as functionally sound.

Sincerely,



Thom Farrell
Mayor
City of Rollingwood

Cc: Victor Vargas P.E. Area Engineer, TxDOT

**RESOLUTION
OPPOSING THE CURRENT
CAPITAL AREA METROPOLITAN PLANNING ORGANIZATION'S
PLANS TO CONSTRUCT ELEVATED LANES
ON HIGHWAY 1 (MOPAC) ACROSS LADYBIRD LAKE**

WHEREAS, The current Capital Area Metropolitan Planning Organization's plans to construct double-decked elevated lanes on Highway 1 (MoPac) across Lady Bird Lake would significantly increase the noise, light and air pollution levels in the vicinity of such proposed lanes; and

WHEREAS, The City is situated on hills adjacent to MoPac which compounds not only the effect of pollution resulting from the proposed elevated highway, but would have a unique visual impact on residents of the City;

WHEREAS, Park development, general public use, and the use of the park areas by youth sports teams will be negatively impacted by such an increase in noise, light, and air pollution; and

WHEREAS, The exit for the planned lanes in the immediate vicinity of Austin High School is seen as an infringement on the school and will result in significant increase in pollution in the immediate vicinity of school sports activities and recreational activities occurring on the lake and adjacent hike and bike trails; and

WHEREAS, The plans for an elevated, direct connection express lane to terminate on the already congested Cesar Chavez will result in an increase in traffic congestion at the point of merger and will cause traffic backups on Mopac, Mopac frontage roads, and other roadways in the vicinity of the City; and

WHEREAS, The project's plan does not provide for such imminent additional capacity on Cesar Chavez street, particularly at the Lamar street bridge, into the downtown area; and

WHEREAS, The City Council of the City of Rollingwood desires to work with the City of Austin and Travis County to develop alternatives to the proposed elevated additional lanes and exits;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF ROLLINGWOOD:

1. The City opposes the current Capital Area Metropolitan Planning Organization's plans to construct double-decked elevated lanes on Highway 1 (MoPac) across Lady Bird Lake.

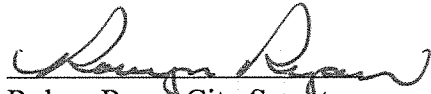
2. The City urges the City of Austin and/or County of Travis to work together with each other and all other affected jurisdictions to develop and propose alternatives to the double-decked elevated highway over Lady Bird Lake that will address traffic congestion on MoPac in a reasonably equivalent manner that minimizes the negative effects on property and uses in the vicinity of MoPac.

Passed and Approved the 15th day of April, 2015.



Thom Farrell, Mayor

Attest:



Robyn Ryan, City Secretary



City of Rollingwood
403 Nixon Drive
Rollingwood, Texas 78746

July 23, 2015

Mr. Al Alonzi
Assistant Division Administrator
Texas Division
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Mr. Russell Zapalac, P.E.
Chief Planning and Project Officer
Texas Department of Transportation
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Mr. Mike Heiligenstein
Executive Director
Central Texas Regional Mobility Authority
3300 N IH-35, Suite 300
Austin, TX 78705

Mr. Ashby Johnson
Executive Director
Capital Area Metropolitan Planning Organization
505 Barton Springs Road, Suite 700
Austin, TX 78704

Re: MoPac South Project

Dear Sirs:

On February 18, 2015, Mike Heiligenstein spoke to the City of Rollingwood (the "City") to provide a general overview of the MoPac South Project (the "Project"), and to solicit comments about its initial design. He accurately observed that the Project was in "our backyard"

and since then, both the Central Texas Regional Mobility Authority (“CTRMA”) and the Capital Area Metropolitan Planning Organization (“CAMPO”) have received numerous comments from Rollingwood residents, and the City voiced its concerns in various meetings about the Project.

The City sent a letter, dated April 1, 2015, detailing what it considers to be the *pros* and *cons* of the Project, and on April 15, 2015, the City of Rollingwood adopted a Resolution Opposing the Current Plans to Construct Elevated Lanes on MoPac.

CTRMA representatives have repeatedly said the initial design, which included elevated lanes, was simply “lines on a page.” CTRMA has also consistently maintained that it is open to alternative design approaches, like the alternative submitted by the City of Austin on May 18, 2015.

In its May 12, 2015 Newsletter, CTRMA said it was extending the MoPac South Environmental Study process in order to allow for additional community input and engineering analysis on the Project, based on comments and other feedback from the public. On behalf of the citizens of Rollingwood, we wish to thank you for extending the process to fully allow for increased transparency into the planning process, and additional public input.

The City of Rollingwood is a municipal corporation and political subdivision of the State of Texas. Consistent with current Federal Highway Authority (“FHWA”) and Texas Department of Transportation (“TxDOT”) National Environmental Policy Act (“NEPA”) guidance, the City should be included in the environmental review process for the MoPac South Project as a “Participating Agency.” Under FHWA and TxDOT guidelines, the roles and responsibilities of Participating agencies include, but are not limited to:

- Participating in the NEPA process starting at the earliest possible time, especially with regard to the development of the purpose and need statement, range of alternatives, methodologies, and the level of detail for the analysis of alternatives.
- Identifying, as early as practicable, any issues of concern regarding the Project’s potential environmental or socioeconomic impacts. Participating agencies also may participate in the issue resolution process described later in this guidance.
- Providing meaningful and timely input on unresolved issues.
- Participating in the scoping process. The scoping process should be designed so that agencies whose interest in the project comes to light as a result of initial scoping activities are invited to participate and still have an opportunity for involvement.

It appears that the City has already been designated as a Participating Agency in the MoPac South NEPA planning process. The City of Rollingwood is specifically identified on CTRMA’s MoPac South website (www.MoPacsouth.com) as one of the governmental agencies participating in the MoPac South Environmental Study as part of the National Environmental Policy Act Technical Working Group (“NEPA Technical Working Group”). The members of the NEPA Technical Working Group are specifically responsible for “providing input on the: Purpose and Need for the project; screening and development of alternatives; methodologies to define impacts; and identification of the preferred alternative.” In addition, the members of the

NEPA Technical Working Group are responsible for review of both the draft and final EA before they are issued publically.

The City welcomes this formal role as a Participating Agency in the MoPac South planning process and looks forward to coordinating closely with TxDOT, CTRMA, CAMPO, the City of Austin and other federal, state, and local agencies and providing early input into the NEPA process. Although we expect that there will be a structure for coordination with the Decision Making Agency, TxDOT, the Lead Agencies, CTRMA and the TxDOT Austin District, and the other Participating Agencies, as well as ample opportunity for input from the City into the planning process, we want to take this initial opportunity to raise a few topics of importance.

Rollingwood supports a sustainable solution to improve mobility and safety.

Rollingwood has previously expressed its support for a number of aspects of the Project, including improved traffic flow on MoPac near the City, increased safety at the entrance and exit ramps to and from FM 2244 and, although not specifically described in any proposed plan, improvements to the intersection of Rollingwood Drive and Barton Springs Road/MoPac Access Road, as well as the developments of hiking and biking trails between Rollingwood and Zilker Park.

The City's April 15 Resolution expressed our opposition to CTRMA's plan to construct elevated lanes on MoPac. It was our position, and it remains our position, that the design and construction of elevated lanes on this portion of MoPac will have unacceptable and irreversible negative impacts on both the human and natural environment in an area, which is in many ways the ecological and recreational heart and soul of the greater Austin community. The negative impacts of elevated lanes across Lady Bird Lake, and directly adjacent to Zilker Park, the Austin Botanical Gardens, and the City would be felt by Austinites, and visitors, alike. However, our opposition to constructing elevated lanes should not be interpreted as opposition to the needed improvements to MoPac South that serve to increase mobility and safety, while being sustainable and sensitive to both the human and natural environment.

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, and has not been provided with any studies that demonstrate otherwise. Unless and until Travis County and the City of Austin choose to make improvements to Cesar Chavez, a tolled "direct connect" to Cesar Chavez will only serve to increase traffic problems near Austin High School.

Rollingwood does not oppose the construction of two express lanes in each direction.

CAMPO and CTRMA have indicated their desire to construct two express lanes in each direction on MoPac South. While the City remains adamantly opposed to the construction of elevated lanes near the City of Rollingwood, we are not generally opposed to the construction of two express lanes in each direction.

Rollingwood is not currently in a position, however, to comment on the use of tolled lanes because we have only seen one proposed design. Rollingwood has not seen any plans

indicating how CAMPO or CTRMA intend to deal with the intersection between MoPac and FM 2244. As you know, the citizens of Rollingwood, and West Lake Hills, will be inconvenienced for a significant period of time during the construction of the Project, and our residents already contend with an inordinate amount of special event traffic (e.g. ACL, Blues on the Green, Trail of Lights, etc.). Despite our repeated efforts to convince TxDOT to modify the special event traffic patterns in and around Rollingwood, the traffic plans are consistently *rubber stamped* by TxDOT without regard to the impact to the residents of Rollingwood, West Lake Hills, and the rest of the traveling public. Rollingwood has previously raised these concerns with CTRMA, but we have yet to see any plans that would address these concerns.

Rollingwood supports the design of a “Signature Bridge” over Lady Bird Lake.

Austin is home to creative and talented minds who love the vibrancy of our growing economy, the natural resources, as well as the recreational opportunities that abound in our region. Our downtown skyline has become a canvas for architectural creativity and expression, which our community has worked hard to foster as we experience unprecedented growth. Lady Bird Lady and the hike and bike trail serve as an oasis for people who seek to paddle, run, hike, or bike in a natural setting. This area is iconic in its representation of the value we place the environment as well as the places that make Austin a special community.

We have serious concerns that if the Project, including the bridge, is built using the standard design-build project delivery method, the eventual construction and delivery of the bridge will prioritize a product that meets mobility needs as inexpensively and quickly as possible, without regard for aesthetics. We are certain that the greater Austin area does not want to create a roadway bridge design that fails to take into account the uniqueness of Austin, and the surrounding environment.

We have the opportunity to work together to create an architecturally significant bridge that serves the purpose of addressing the need for increased mobility and safety while being an aesthetically pleasing gateway to downtown. This approach is by no means novel. The City of Dallas recently partnered with Dallas Area Rapid Transit, Dallas County, North Texas Tollway Authority, Texas Department of Transportation - Dallas District, Texas Parks and Wildlife Department and the U.S. Army Corps of Engineers to design and build not one, but three architecturally significant bridges for highway projects as a part of the Trinity River Corridor Project (see www.trinityrivercorridor.com). Our creative, vibrant, and unique community has an opportunity to work together with our partner agencies create something that is iconic and lasting. We should work together to plan for, design, and build a MoPac South Bridge spanning the lake that respects the architectural beauty, innovation, and mobility this area needs and deserves.


In conclusion, the City is very supportive of the goals of increased mobility and safety. However, the City remains firmly opposed to elevated lanes. The City is also supportive of improvements to MoPac South that will enhance traffic flow around the intersection of FM 2244 and Rollingwood Drive and looks forward to reviewing designs that take into account traffic flows during construction, anticipates future traffic increases, and improves mobility during special events. The City of Rollingwood welcomes its enhanced role as a Participating Agency in

the planning process and its future involvement on the NEPA Technical Work Group. We urge TxDOT, CTRMA, CAMPO, and our fellow Participating Agencies to take advantage of the opportunity to plan, design and build an architecturally significant bridge over Lady Bird Lake, which will over time become an iconic part of the heart and soul of our community.

Finally, we look forward to working closely with the other Participating Agencies to fully participate in the NEPA process, especially with regard to the development of the purpose and need statement, the screening and development of the range of alternatives, methodologies to define impacts, and the level of detail for the analysis of alternatives, and the eventual identification of the preferred alternative for the MoPac South Project.

In that regard, please let us know as soon as possible about the next NEPA Technical Working Group meeting, which we expect will occur prior to the Open House scheduled for some time in August.

Sincerely,

A handwritten signature in black ink, appearing to read 'Thom Farrell', written over a horizontal line.

Thom Farrell, Mayor
City of Rollingwood



November 18, 2015

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Austin, TX 78704

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.

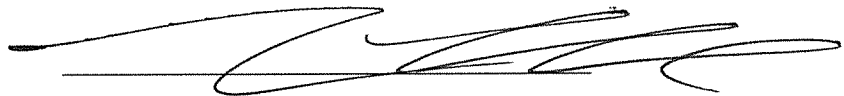
The City of Rollingwood supports a multi-use path on the west side of the MoPac access road.

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



**CITY OF ROLLINGWOOD
403 NIXON DRIVE
ROLLINGWOOD, TEXAS 78746
512-327-1838**

March 7, 2017

Mike Heiligenstein
Executive Director
3300 N. IH-35, Suite 300
Austin, Texas 78705

Dear Mr. Heiligenstein:

Thank you for meeting with us on January 26, 2017. It was a pleasure meeting with you and Dee Anne. As you suggested, we would be happy to bring a group from Rollingwood to your offices to study and discuss with you and your staff the various configurations/details of the designs currently being proposed for MoPac South improvements. We will be in touch soon to set up a date and time for that meeting.

In the meantime, I am also taking you up on your offer to provide the following information to us:

- 1) All traffic studies, whether draft or final, for the Bee Cave Road (R.M. 2244) and MoPac (Loop 1) intersection;
- 2) All traffic studies, whether draft or final, for traffic exiting the south bound Bee Cave Road (R.M. 2244) exit when headed south on MoPac; and,
- 3) All traffic studies, whether draft or final, for the intersection of Rollingwood Drive and Barton Springs Road/MoPac (Loop 1) frontage road.

As I stated at our meeting, the City of Rollingwood and our citizens continue to be very concerned about the impact that the MoPac South improvements will likely have on the intersection of Bee Cave Road (R.M. 2244) and MoPac (Loop 1). Adding to this concern, I have recently been informed that this intersection currently handles even more traffic on a daily basis than the intersection of MoPac and Cesar Chavez. The intersection of MoPac and Bee Cave Road is already problematic and every indicator suggests to Rollingwood that it will continue to get worse unless it is adequately addressed. Elevated lanes over Bee Cave Road at MoPac, which would use up most if not all of the right of way, would severely restrict the ability to address both

present and future problems at that intersection. Because the design and construction of the MoPac South improvements will either directly or indirectly affect this already strained intersection, it is imperative to fully consider and address any impacts to this intersection resulting from the design and construction of the MoPac South improvements as part of the National Environmental Policy Act (“NEPA”) review before a design is chosen. The current problems with this already extremely congested intersection as well as future adverse impacts on this intersection associated with the MoPac South project are currently and will continue to be magnified with special events traffic during the Austin City Limits Festival, the Trail of Lights festival, Blues on the Green concerts, and other similar events at Zilker Park.

It is the City of Rollingwood’s position that the proposed design alternative that includes two express lanes in each direction without relying on elevated lanes has not been fully “optimized.” In other words, we feel that this design alternative was proposed and prematurely dismissed, rather than taking the time and attention necessary to incorporate effective engineering designs into the alternative to make it as functional as it should be. Unless and until all of the proposed designs have been “optimized,” then a fully informed comparison of designs and meaningful selection of a preferred design cannot and should not be made.

As we have expressed to you before, the City of Rollingwood continues to oppose elevated lanes of any kind over MoPac. We do not want to see the same mistakes in elevated roadway design experienced by other U.S. cities, including Texas cities such as Dallas (I-345) and Houston (I-45 Pierce Elevated), repeated here in Austin, especially in the heart of an area that is so special, historic, and irreplaceable. Zilker Park, Lady Bird Lake, the City of Rollingwood, and the City of Austin all deserve better and working together we can do better.

Thank you again for meeting with Mike Dyson, Charles Winfield, and me. We look forward to continuing to work with you and we want to actively participate in the process of selecting a final design for MoPac South improvements. We appreciate your receptiveness to our participation in the process.

Sincerely,

Roxanne McKee

Mayor

cc: Senator Kirk Watson

Representative Donna Howard



**CITY OF ROLLINGWOOD
403 NIXON DRIVE
ROLLINGWOOD, TX 78746**

November 27, 2017

Mr. Mike Heiligenstein
Executive Director
Central Texas Regional Mobility Authority
3300 N IH-35, Suite 300
Austin, TX 78705

Re: MoPac South Project

Dear Mr. Heiligenstein:

Thank you again for hosting our recent meeting at your offices. We appreciate the opportunity to discuss various aspects of the Mopac South Environmental Study (“MoPac South Project” and “MoPac South”) planning process and design alternatives with you and Central Texas Regional Mobility Authority (“CTRMA”) staff. We also appreciate the involvement of CTRMA board chair Ray Wilkerson and CTRMA board member David Armbrust at the meeting. This letter provides comments on several of our highest priority issues related to the MoPac South planning process, alternatives analysis, and design elements.

I. The MoPac South process and design should ensure that the Bee Cave Road (RM 2244) intersection functions efficiently and can be improved in its existing configuration in the future.

We appreciate CTRMA staff’s willingness to think seriously and creatively about how best to improve the Bee Cave Road (RM 2244) intersection (“Bee Cave Intersection”) for both the present and the future. As you are aware, this is a vital intersection for our City, our residents, and local businesses. It represents a gateway to not only Rollingwood, but much of Western Travis County.

We understand that the Bee Cave Road intersection is not currently part of the project area and design, however, we want to inform you that the City of Rollingwood does not support the elimination of the Bee Cave Road intersection by creating a “Right-in Right-out” traffic pattern where RM 2244 meets the MoPac access road. The elimination of the Bee Cave Road intersection and shift to this “Right-in Right-out” traffic pattern would negatively impact our residents and local businesses; exacerbate existing traffic problems related to the existing location of MoPac on-ramps and off-ramps; create new traffic issues at the Rollingwood Drive/Andrew Zilker underpass; and, encourage an increase in cut-through traffic along Rollingwood Drive through the heart of our City.

Historically speaking, it appears that the traffic flows and travel times of those traveling north or south in the Austin area take priority over those traveling east or west. With a “Right-in Right-out” traffic pattern at Bee Cave Road/MoPac, those traveling east on Bee Cave Road and attempting to go north on MoPac would have a significant distance and, at certain times of the day, minutes added to their travel times as they made their way south to Barton Skyway to make a turnaround to head north.

Given that this intersection at Bee Cave Road and MoPac sees more traffic than at the Cesar Chavez/MoPac intersection, we believe that the Bee Cave Road intersection should be given highest priority. While “Right-in Right out” is an option, we do not think that it is the “right one” (pardon the pun).

Similarly, the City of Rollingwood does not support a “Diverging Diamond” or “Continuous Flow” intersection at the Bee Cave Road intersection. We think that this type of design in this location would be too confusing for drivers and would not adequately address the traffic problems now or in the future.

In addition, with respect to the Bee Cave Road/MoPac intersection, the City of Rollingwood respectfully requests that any configuration of toll road options proximate to Bee Cave Road use as little of the right of way as possible to allow for flexibility in future improvements of this vital intersection.

II. The City of Rollingwood continues to support the development of an alternative design for MoPac South which incorporates “underpasses” similar to the underpass design utilized on the Mopac Improvement Project (“MoPac North project”) or the “cantilever approach” proposed for the I-35 Improvement Project.

We appreciate your willingness to study the feasibility of all potential congestion relief options that are at or below grade level – specifically, an express lane underpass design between Bee Cave Road (RM 2244) and Barton Springs Road that we discussed with you at our recent meeting. This alternative would mirror the express lane underpasses that were constructed as part of the MoPac North project, which have been touted by CTRMA representatives in media reports as being both less expensive to build and having less visual and sound impact to surrounding neighborhoods than braided, elevated overpasses.

We ask that this express lane underpass option be fully designed and studied as a part of the ongoing alternative analysis for MoPac South. If the design of express lane underpasses for MoPac South will require any design waivers from TxDOT, we request that CTRMA staff meet with us to discuss it and to work cooperatively to see if there are any design changes or improvements that would reduce or eliminate the need for waivers from TxDOT. In the meantime, we request that you provide us with copies of the “as-built” design layouts and drawings for the North MoPac express lane underpasses.

Recently, in TxDOT reports to the media regarding the I-35 project, TxDOT proposes eliminating the upper deck that runs between Martin Luther King Jr. and Airport Boulevards, replacing the two free lanes on each side with added freeway lanes tucked under the frontage lanes using a cantilever approach. We ask that this cantilever design option proposed for I-35 be fully considered as a part of the ongoing alternative analysis for MoPac South.

III. The City of Rollingwood remains opposed to the “Two Express Lanes + Elevated Ramps near Barton Skyway” alternative in its current configuration.

We appreciate CTRMA presenting to the City during one of the recent meetings preliminary sketches of a potential adjustment to the design of the “Two Express Lanes + Elevated Ramps near Barton Skyway” (“Wishbone”) alternative.

The preliminary sketches propose reducing the elevation of the elevated ramps down to the grade of the existing main MoPac travel lanes north of the Bee Cave Road intersection, and shift the higher elevations to the south of the Bee Cave intersection. In spite of this, the City of Rollingwood continues to have serious concerns regarding the Wishbone alternative in its current configuration and in the preliminary sketches. As we indicated in previous correspondences to you, the City remains unconvinced that the Wishbone alternative with elevated ramps near Barton Skyway will improve traffic flow into or out of downtown Austin, or on MoPac.

Most importantly, it appears that the current design of the Wishbone alternative presented to the public and the preliminary sketches provided during the meeting would place the elevated braided overpasses in a configuration that would conflict with general use traffic using the northbound MoPac entrance ramp to the north of the Bee Cave intersection and the southbound MoPac exit ramp to the north of the Bee Cave intersection. Our concern is that the current placement of the elevated express lanes will only serve to exacerbate traffic issues associated with the entrance and exit ramps, rather than improving them.

We also are highly concerned that the proposed Wishbone alternative design will create a “static” situation that will result in a deterioration of the traffic flow in and around the Bee Cave intersection without any acceptable way to improve this critical and highly utilized intersection in the future.

As we have mentioned in previous correspondence to you, 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. TxDOT has proposed that

the I-35 project focus on eliminating the upper deck that runs between Martin Luther King Jr. and Airport Boulevards, replacing those two free lanes on each side with added freeway lanes tucked under the frontage lanes using a cantilever approach.

As to MoPac South, the Wishbone alternative 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.

IV. The City of Rollingwood continues to support the “Two Express Lanes Without Downtown Direct Connections” as the best option that has been presented by CTRMA, and asks that it be fully “optimized” consistent with the “Wishbone” alternative.

The City of Rollingwood continues to take the position that the alternative which contains two express toll lanes in each direction without “double decker” elevated lanes (“Two Express Toll Lanes Without Direct Connection To Downtown” alternative) (“Two Express Toll Lanes”) should be the preferred option at this time. We are disappointed that this alternative has not been improved or “optimized” since it was first presented to the public at the November 10, 2015 Open House despite repeated requests to do so.

By contrast, the Wishbone alternative has been “optimized” in several ways in which the Two Express Toll Lanes alternative has not. We are hopeful that this does not mean that CTRMA has prematurely abandoned a reasonable alternative in favor of a predetermined outcome or alternative.

CTRMA has represented that the optimizations that have been added to the Wishbone alternative yield travel times on the express lanes that are the same as the travel times estimated for the “double decker” plan: 9 minutes. We think that once the Two Express Toll Lanes alternative is fully optimized like the Wishbone alternative has been, it will show that the travel times are comparable. These two alternatives in their current state cannot be fairly compared to each other or reasonably evaluated by the public.

Currently, Two Express Toll Lanes without a direct connection alternative is merely the same plan proposed for the original double decker configuration over Lady Bird Lake without the infrastructure for the double decker. Optimizing the Two Express Toll Lanes alternative to include TSM improvements and additional capacity will improve the travel times without requiring elevated lanes. Optimizing the Two Express Toll Lanes alternative should, at a minimum, include the following:

1. Improvement of the design and placement of the on-ramps and off-ramps surrounding the Bee Cave Road and MoPac intersection given the available R.O.W.
2. The Wishbone alternative includes an extra general-purpose lane on each side between Cesar Chavez and Bee Cave Road. These additional capacity lanes should be integrated into the Two Express Toll Lanes between Bee Cave Road and Cesar Chavez. Consistent

with the Wishbone alternative, adding the additional lanes of capacity to each side of the bridge across Lady Bird Lake (from 5 lanes each direction to 6 lanes each direction) will remove one of the existing merging bottlenecks for southbound MoPac traffic entering from the southbound MoPac frontage road, 5th Street, Cesar Chavez and Lake Austin Blvd. The southbound additional capacity lane could serve as a dedicated exit lane for the Bee Cave Road exit. The northbound additional capacity lane could serve as an additional on-ramp lane from the Bee Cave Road/Barton Springs frontage road. Adding these lanes provides more opportunities for studying alternative designs for improving the on and off ramps accessing Bee Cave Road.

3. The Wishbone alternative includes a dedicated lane for traffic entering southbound MoPac from Lake Austin Blvd and 5th Street. This configuration of 2 lanes removes a known bottleneck where inbound Lake Austin Blvd/5th Street traffic and Cesar Chavez traffic merge before entering MoPac. Removing this bottleneck from the Two Express Toll Lanes alternative will improve travel times for southbound traffic between Cesar Chavez and Bee Cave Road.
4. Improvement of the routes on and off of MoPac used by both toll lane and non-toll lane traffic.

As stated above, the City of Rollingwood continues to posit that the Two Express Toll Lanes Without Downtown Direct Connections alternative is the option which fully meets all MoPac South project "goals and objectives" while having the fewest adverse impacts to the human and natural environment and significantly improving travel times. This alternative is fully consistent with the CAMPO 2040 Regional Transportation Plan. As noted in the past, 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. Furthermore, this alternative is more fiscally responsible because it would cost an estimated \$30 million less than the Wishbone concept and an estimated \$40 million less than the double decker over Lady Bird Lake, all while achieving similar results in transportation efficiency. This alternative would provide tolled express lane users and emergency vehicles plenty of time and ability to safely maneuver and exit downtown.

As previously stated, we are hopeful that CTRMA has not prematurely abandoned a reasonable alternative in favor of a predetermined outcome or alternative. We note that the following FAQ was published on the "MoPacSouth.com" website on or before October 29, 2017, but was removed as of November 3, 2017:

"Why do we need a connection between downtown and the Express Lanes?"

Four of the Express Lane configuration options presented in November 2015 include a non-weaving or direct connection between the proposed MoPac South Express Lanes and the downtown Austin core. Two configurations utilized direct connector ramps that elevated over the existing bridges at Lady Bird Lake. Two other configurations utilized "wishbone" ramps that elevated over the general purpose lanes in the area of Bee Cave

Road/Barton Springs Road and would allow Express Lane traffic to merge easily into the correct lane for accessing/exiting downtown.

A non-weaving connection like these between downtown Austin and the Express Lanes would serve the approximately 40% of MoPac South drivers that head downtown in the morning, or the approximately 51% of traffic leaving downtown in the evening to travel on MoPac South. This type of connection increases the safety of all users by eliminating a potentially dangerous weaving condition that would [be] exist in the two [of the] Express Lane configurations under consideration that require Express Lane traffic to merge into the general purpose lanes south of Lady Bird Lake to access existing downtown ramps.

Direct connections to/from downtown would improve travel times for Express Lane users by up to four minutes in the morning and 10 minutes in the evening. These connections would improve travel times for each general purpose lane user by up to 3 minutes in the morning and 7 minutes in the evening."

We continue to have concerns that the MoPac study process has included positions like the one presented in the FAQ to the public regarding elevated lanes on the MoPac South Environment Study website, when the non-elevated alternatives have not yet been similarly optimized. In addition, we request that you provide us with the traffic data that was used as the basis for calculating the statistics in the FAQ statement of: "*A non-weaving connection like these between downtown Austin and the Express Lanes would serve the approximately 40% of MoPac South drivers that head downtown in the morning, or the approximately 51% of traffic leaving downtown in the evening to travel on MoPac South.*"

V. **The City of Rollingwood requests that CTRMA update all proposed alternatives for the MoPac South project to show interconnection with the MoPac North project as currently constructed and the MoPac Intersections Environmental Study as finalized, with a dedicated public comment period for review and comment on the proposed interconnections.**

We respectfully request that prior to any final environmental decision as part of the MoPac South Environmental Study, CTRMA release at least one alternative design reflecting the interconnection between the MoPac South Project and the MoPac North Project because the MoPac north of Lady Bird Lake portion is now constructed. A dedicated period of time for the public to review and comment on such design should be provided.

Recently, CTRMA completed a portion of the MoPac North Project that included restriping the general purpose lanes of southbound MoPac between Enfield and Lady Bird Lake to remove the previously dedicated, general purpose southbound Winsted entrance ramp. CTRMA reassigned the general purpose entrance ramp lane to be a dedicated southbound toll exit lane.

The City of Rollingwood, its residents, and its businesses have been negatively impacted from the reassignment of the southbound Winsted entrance ramp as a dedicated southbound toll exit lane. This reassignment has introduced a new bottleneck into the general purpose lanes in southbound MoPac, causing more travel delays for southbound traffic exiting at Bee Cave Road

into the City's commercial and residential areas. Rollingwood residents attempting to leave the downtown Austin center through alternative routes to access the City of Rollingwood through Barton Springs and Stratford Road are encountering more delays.

In the MoPac North project, as currently constructed, the southbound lanes terminate with a toll lane exit south of Enfield Road, and the northbound lanes start with a toll lane entrance north of Enfield Road. In the proposed alternatives for the MoPac South project, the newly constructed southbound toll lane exit south of Enfield Road does not appear, however, a southbound toll lane entrance is shown south of Enfield Road. In addition, in the proposed alternatives for the MoPac South project, the newly constructed northbound toll lane entrance north of Enfield road does not appear, however, a northbound toll lane exit ramp is shown south of Enfield.

The City of Rollingwood, in participating in Technical Working Group meetings and other meetings with CTRMA officials regarding the MoPac South Environmental Study, has frequently commented on and requested clarification of how the proposed alternatives for the MoPac South project will connect with the final design in the 2012 FONSI for the MoPac North Project, which is now nearing completion. CTRMA has not provided the City of Rollingwood or the public with clarification on how the MoPac South project will connect with the MoPac Improvement Project, as MoPac north of the Lady Bird Lake is now configured and built. Both the Technical Working Group for the MoPac South Environmental Study and the public should have an adequate opportunity to review proposals for interconnecting the MoPac North Project, as approved in the FONSI, and the MoPac South Project.

In an Austin-American Statesman article dated October 26, 2017, titled "On southbound Mopac, toll lane drivers win, Winsted drivers lose," Ben Wear reports on the reassignment of the Winsted entrance ramp as a toll exit lane and states:

Furthermore, mobility authority officials said, the new configuration is the safer option and aligns with typical highway design.

"Normally a ramp has to merge when it comes into a major highway like this," said Steve Pustelnyk, director of community relations for the mobility authority, noting that is the case on most of southbound MoPac's other entrances northward to RM 2222 and beyond. The crunch on southbound MoPac's four-lane bridge over Lady Bird Lake, Pustelnyk said, generally causes afternoon slow-and-go traffic for several miles north of the river.

Had the striping remained the same near the Winsted entrance, Pustelnyk said, what is expected to be high-speed traffic from the toll lane would have to come to a sudden stop to merge into a lane of much slower MoPac traffic.

"Either way, this is a problem for everybody driving the southbound MoPac corridor," Pustelnyk said. "And the backups won't be resolved until we add capacity on the bridge, and south of the bridge."

The statements by CTRMA's representative in the Statesman article indicate that CTRMA has a plan for resolving the backups caused by reassigning the Winsted entrance ramp, but that the

plan will not be in place until “we add capacity on the bridge and south of the bridge”. This plan for resolving the backups has not been released to the public as part of the MoPac South Project. CTRMA’s representative’s statement also indicates that the effectiveness of the MoPac North project to relieve traffic backups caused by the reassignment of a general purpose lane to a toll lane is tied to, and dependent upon, the MoPac South Project being built. Clearly the two projects are intended to rely on each other. Thus far, however, the public has only been presented with these two projects as separate endeavors and has not been provided with an adequate opportunity to comment on proposed interconnections of the two projects.

We respectfully request that CTRMA provide the public with proposed alternatives that clarify the design interconnecting the MoPac South and MoPac North projects, and provide evidence to support the statement that adding capacity on the bridge and south of the bridge will solve the current backup caused in the general purpose lanes by CTRMA’s reassignment of a general purpose lane to toll traffic on southbound MoPac north of Lady Bird Lake.

It is unclear from the current proposed alternatives in the MoPac South Environmental Study whether CTRMA’s plan to resolve the backups caused by reassigning the Winsted entrance ramp would: (1) include adding an additional lane of capacity to the bridge to replace the Winsted entrance ramp; or, (2) remove the current southbound toll lane exit point south of Enfield on southbound MoPac, instead routing the toll lane traffic across the bridge in a new toll lane and returning the lane space to the Winsted entrance ramp.

In addition, the statements by CTRMA’s representative in the Statesman article indicate that CTRMA chose to realign the Winsted entrance because “it is the safer option and aligns with typical highway design” and, without the realignment, the high-speed traffic on the toll lanes would have to come to a sudden stop to merge with the slower general lane traffic on MoPac South. The current proposed alternatives for the MoPac South project are inconsistent with this. All 6 alternatives show a proposed exit point for the northbound toll lane traffic just prior to the Enfield lane exit, and require drivers to merge from the inner toll lane into the slower general lane traffic on MoPac North *without* a dedicated toll exit lane. It appears that inconsistent safety and highway design principles are being applied to the MoPac North project and the MoPac South project with regard to toll lane egress.

Currently, the proposed alternatives for the MoPac South project for northbound traffic south of the Enfield exit add an unsafe condition in which northbound toll lane traffic would come to a halt when attempting to merge into the slower northbound general lane traffic just prior to Enfield lane. It is unclear whether CTRMA has a plan to address this safety issue. In addition, the proposed exit point for the northbound toll lane traffic prior to the Enfield exit, without a dedicated toll exit lane, introduces a new bottleneck into general purpose lanes that would negatively impact traffic flow on northbound MoPac, thereby negatively impacting the flow of eastbound traffic from Bee Caves Road attempting to head northbound on MoPac.

Along a similar vein, we respectfully request that prior to any final environmental decision as part of the MoPac South project, CTRMA also release at least one alternative design for, and provide a dedicated period of time for the public to review and comment on, proposed

interconnections between the MoPac South Environmental Study and the MoPac Intersection Project, as finalized in the FONSI issued on December 22, 2015.

While the MoPac Intersections project has the goal to improve intersections at Slaughter and La Crosse, which do not directly abut the City of Rollingwood, Rollingwood is impacted by changes throughout the MoPac South project that potentially change the volume of traffic expected on MoPac South. Currently, none of the proposed alternatives for the MoPac South project show interconnectivity with the final design in the MoPac Intersections study, including the removal of traffic lights that currently control the flow of traffic on the lanes of MoPac South. In addition, the MoPac Intersections study does not show interconnectivity with any alternative of the MoPac South project, including toll lanes that run along the inner lanes of MoPac South in its current configuration.

VI. The City of Rollingwood continues to request implementation of Bike and Pedestrian Infrastructure to provide consistent, direct access to and from downtown Austin as part of the MoPac South improvements

As part of Technical Working Group meetings and other working group meetings hosted by CTRMA, representatives of the City of Rollingwood have commented on the lack of consistent, direct bike and pedestrian connectivity traveling from the south end of the project to connect with downtown Austin in the alternatives presented. In particular, CTRMA has proposed the bike and pedestrian path for the MoPac South project running alongside the northbound lane of MoPac, terminate on the south side of Barton Springs Road, however, the MoPac South project terminates at Cesar Chavez.

Currently, the proposed bike and pedestrian connection in the MoPac South project alternatives from the south side to the north side of Barton Springs Road requires 3 cross walks in an area with high speed traffic and topography that creates blind spots. A bike and pedestrian bridge over Barton Springs Road has been proposed by the City of Rollingwood with support from City of Austin staff. The proposed location (where bike traffic now crosses under MoPac) is in TxDOT right of way. This necessary connection point should be considered as a bike and pedestrian infrastructure improvement through the MoPac South project. It is important to have multimodal transportation options to give south Austin bikes and pedestrians cross street bicycle connectivity accommodations.

In addition, representatives of the City of Rollingwood have requested clarification on whether the current bike and pedestrian path that connects Barton Springs Road to Stratford Road, running on the east side of MoPac, will be replaced or updated as part of the MoPac South project. On 5 of the 6 alternatives, the current bike and pedestrian connection is removed, and in the “City of Austin” alternative, the bike and pedestrian connection is relocated.

We ask that infrastructure improvement options for providing bike and pedestrian connections from the south side of Barton Springs to the north side of Barton Springs and from the north side of Barton Springs to Stratford Drive, parallel with and proximate to MoPac, be fully designed and studied as a part of the ongoing alternative analysis for MoPac South. Additional bike and pedestrian infrastructure could help address special event traffic issues around and near

Zilker Park and Barton Springs Road and may minimize the need for temporary road closures and barricading during special events by providing separate, permanent facilities for bike and pedestrian traffic across Barton Springs Road.

Finally, we very much appreciate the opportunity to work closely and candidly with CTRMA staff on the process and design of MoPac South improvements, and 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.

Thank you for your time and attention to these matters.

Sincerely,



Roxanne McKee, Mayor
City of Rollingwood

Cc: Mr. Ray A. Wilkerson
Chairman, Board of Directors
Central Texas Regional Mobility Authority

Mr. David B. Armbrust
Board Member, Board of Directors
Central Texas Regional Mobility Authority

Mr. Al Alonzi
Assistant Division Administrator
Texas Division
Federal Highway Administration
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Mr. Russell Zapalac
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125 East 11th St.
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Mr. Terry G. McCoy, P.E.
District Engineer, Austin District
Texas Department of Transportation
P.O. Box 15426
Austin, TX 78761-5426

Mr. Ashby Johnson
Executive Director
Capital Area Metropolitan Planning Organization
505 Barton Springs Road, Suite 700
Austin, TX 78704



July 10, 2019

Mr. Ashby Johnson
Executive Director
Capital Area Metropolitan Planning Organization
3300 N. Interstate 35, Suite 630
Austin, Texas 78705

Re: Regional Arterials Study, "Draft June 2019"

Dear Mr. Johnson:

The City of Rollingwood appreciates the opportunity to comment on the Regional Arterials Study. As part of the current process phase of "Draft June 2019" during the Public Open House for the Regional Arterials Study, the City of Rollingwood respectfully submits the following comments regarding current and future safety and connectivity needs in view of the "vision network" presented in the "Arterials Boards". The City of Rollingwood is a primary connector point for most of Western Travis County and desires to see improvements to the safety, mobility, economy, and environment of multimodal transportation choices along the roadways that intersect and border the City of Rollingwood and provide connectivity to downtown Austin.

I. The Regional Arterials Study and the need for providing local governments and the public a current version of the Regional Corridor Inventory for all counties

During one of the phases of the Regional Arterials Study, in April 2019, CAMPO distributed a Travis County Regional Corridor Inventory to Small Cities in Travis County and requested comments on the descriptions of roadways impacting small cities. The Travis County Regional Corridor Inventory includes an itemized inventory of local roadways, listed by regional project numbers, and descriptions of existing design, planned improvements, and "new facilities". The City of Rollingwood provided the following comments related to the Travis County Regional Corridor Inventory:

- (a) As to regional project number 90, "Bee Cave/Barton Springs/Riverside Connection", which includes 9 separate project segment descriptions along Bee Caves Road:

i. As to “90.1, Project/Facility Name: Bee Cave Rd – FM 2244; County: Travis; Project Type: Improvement; From SH 71; To: SL1; Source: CAMPO Gap; 2045(Design Type) Undivided; 2045 (improvement, # lanes): 4”, the City of Rollingwood, through Council Member and TAC Appointee Amy Pattillo, commented: *It is confusing that the entire length of Bee Cave Road is listed as a segment and characterized as undivided, 4. The majority of Bee Caves Road now is 4 lanes with a center turn lane.*

ii. As to “90.6, Project/Facility Name: Bee Cave Rd – FM 2244; County: Travis; Project Type: Improvement; From 0.1 Mile East of Redbud Trail; To: 1000 Ft. West of Buckeye Trail; Source: TxDot; 2045(Design Type) Divided; 2045 (improvement, # lanes): 5”, the City of Rollingwood, commented: *It is inconsistent that in 90.2, 90.3, 90.4, and 90.5, Bee Caves Road is described as divided 4 and in 90.6, 90.7, 90.8 and 90.9 it is described as divided 5. All these segments, existing or as planned for improvement (from my knowledge) are 4 lanes with a center turn lane.*

iii. As to “90.10, Project/Facility Name: Mopac Frontage Rd; County: Travis; Project Type: Existing; From Mopac Frontage Rd; To: Barton Spring Rd; Source: CAMPO Gap; 2045(Design Type) Divided; 2045 (improvement, # lanes): 6”, the City of Rollingwood, commented: *The portion of the Mopac frontage road between Bee Cave Road and the start of Barton Springs Road is only 2 lanes on each side, 4 lanes total.*

- (b) As to regional project number 316, Mopac, which includes a single listing of “316.2, Project/Facility Name: Mopac; County: Travis; Project Type: Existing; From SH 45 S; To: Cesar Chavez; Source: TxDot; 2045(Design Type) Divided; 2045 (improvement, # lanes): 6 (non-tolled) + 4 Managed Lanes (tolled) + 4 frontage”, the City of Rollingwood, commented: *The description of Mopac appears to only include the bounds from the Northern point to Cesar Chavez, but not from Cesar Chavez to the Southern point. The description of Mopac, north of Cesar Chavez is marked as existing, however, is inconsistent with what currently exists, which is 6 (non-tolled) with 2 managed lanes (tolled). There are also portions of Mopac North of Cesar Chavez that do not include 4 frontage and also portions south bound from the 5th street exit to the 5th street entrance ramp that are only 2 non-tolled lanes. Before the Inventory is distributed to Councils and Commissioners Courts, I would respectfully request the opportunity to review and comment on the additional description of Mopac for the one or more segments proposed between Cesar Chavez and SH 45 SW.*


The City of Rollingwood notes that the “Draft June 2019” Public Open House does not include a Regional Corridor Inventory for any of the counties, for review by the public. In addition, the City of Rollingwood has not been provided with any updated draft of the Travis County Regional Corridor Inventory indicating whether any of the City of Rollingwood’s comments have been incorporated into the Travis County Regional Corridor Inventory or whether any other local government comments have been incorporated into the Travis County Regional Corridor Inventory.

In addition, the City of Rollingwood respectfully submits that the maps provided as part of the “Draft June 2019” Open House documents do not provide the City of Rollingwood, or its businesses and residents, with information indicating that the maps are based on the information collected into the Regional Corridor Inventory for each county. At a minimum, the “Draft June 2019” Open House

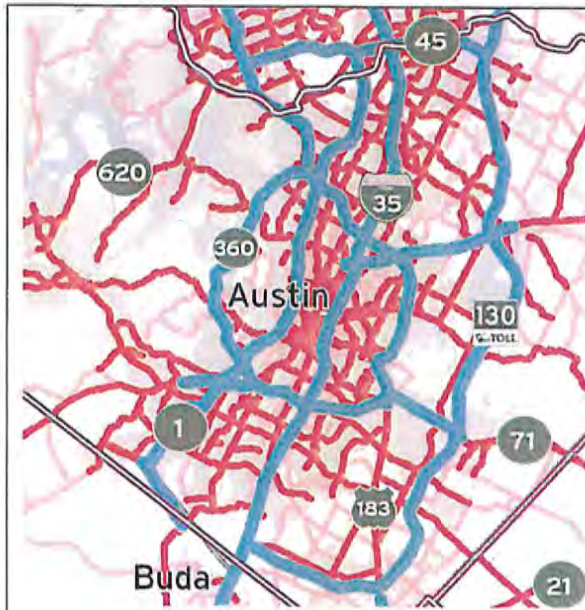
documents do not inform the City of Rollingwood or the general public regarding the assumptions made regarding the existing and/or planned updates to Mopac or Bee Caves Road.

The City of Rollingwood notes the following:

(1) As to the “existing” map on page 7 of the “Arterial Boards”:

	<p>(a) Loop 1 is classified, from 45N to the 45SW, as a “limited access” segment, a “principal arterial” segment, a “limited access” segment, a “principal arterial” segment, a “limited access” segment and a “principal arterial” segment. The Regional Corridor Inventory previously provided to the City of Rollingwood does not reflect a separate description for each of these alleged segments, and also does not include any project description for Loop 1 South of Cesar Chavez.</p> <p>(b) In addition, it is unclear from the Arterial Boards what criteria is used to label a segment of a roadway as “limited access” or “principal arterial”. There are portions of Loop 1 illustrated that include “managed lanes” and are labeled as both a “principal arterial” and “limited access” and there are portions of Loop 1 illustrated that do not include managed lanes and are labeled as both a “principal arterial” and “limited access”.</p> <p>(c) Bee Caves Road is shown as a “principal arterial” from east to west, however, the Regional Corridor Inventory describes 9 segments of Bee Caves Road.</p> <p>(d) It is unclear whether the Regional Corridor Inventory previously provided to the City of Rollingwood was informed by the “existing” map on page 7 of the “Arterial Boards” or whether the Regional Corridor Inventory has been updated to reflect the “existing” map.</p>
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(2) As to the “planned” map on page 7 of the “Arterials Boards”, based on the “2040 Planned Network”:



(a) Loop 1 is classified, from 45N to the 45SW, as a “limited access” segment. The Regional Corridor Inventory previously provided to the City of Rollingwood does not provide any description of any planned improvements to Loop 1 to support the “planned” map.

(b) Based on project descriptions in the CAMPO 2040 plan, the “planned” map appears to show primarily “managed lane” planned roadways as the “limited access” roadways.

(c) The CAMPO 2040 Plan specifically segments planned updates to Loop 1 South between the limits of Cesar Chavez and Slaughter Lane, but provides no planned improvements between Slaughter Lane and 45SW.

(d) It is unclear whether the Regional Corridor Inventory previously provided to the City of Rollingwood was informed by the “planned” map on page 7 of the “Arterial Boards” the CAMPO 2040 plan, or whether the Regional Corridor Inventory has been updated to reflect the “planned” map or CAMPO 2040 plan.

(3) As to the “Scenario A” map on p. 8 and “Scenario B” and “Scenario C” maps on p. 9 of the “Arterials Boards”:



(a) In “Scenario A”, “Scenario B”, and “Scenario C”, Bee Caves Road is proposed as including a “reversible lane” scenario. P. 5 of the “Arterial Boards” shows the only potential design option for a reversible lane by repurposing a center turn lane as a reversible lane. It is unclear from the Regional Corridor Inventory that the “improvement” listed under regional project number 90.1 of Bee Caves Road as an undivided 4 lane road, would contemplate using the almost completed safety improvement of a center turn lane between Loop 360 and Rollingwood Drive, as a reversible lane, instead of a center turn lane.

(b) In “Scenario A”, “Scenario B”, and “Scenario C”, it is unclear why a dotted line is proposed between the southern point of Loop 1 and I-35 as a “limited access” roadway, but the existing improvements, of both SH45SW, which is shown on both the “existing” and the “planned” maps, and the upgrade of FM 1626 from a “minor arterial” in the existing map to a “principal arterial” in the “planned” map, are not considered. The City of Rollingwood has commented in the past requesting that the traffic impacts on Mopac South due to the constructions of SH45SW and the upgrade to FM1626 have not yet been adequately measured; the City of Rollingwood is opposed to converting Loop 1 into an I-35 bypass, to the detriment of local traffic, which would be effected if Loop 1 is designed with express lanes directly connected to I-35 South of downtown Austin to I-35 North of downtown Austin.

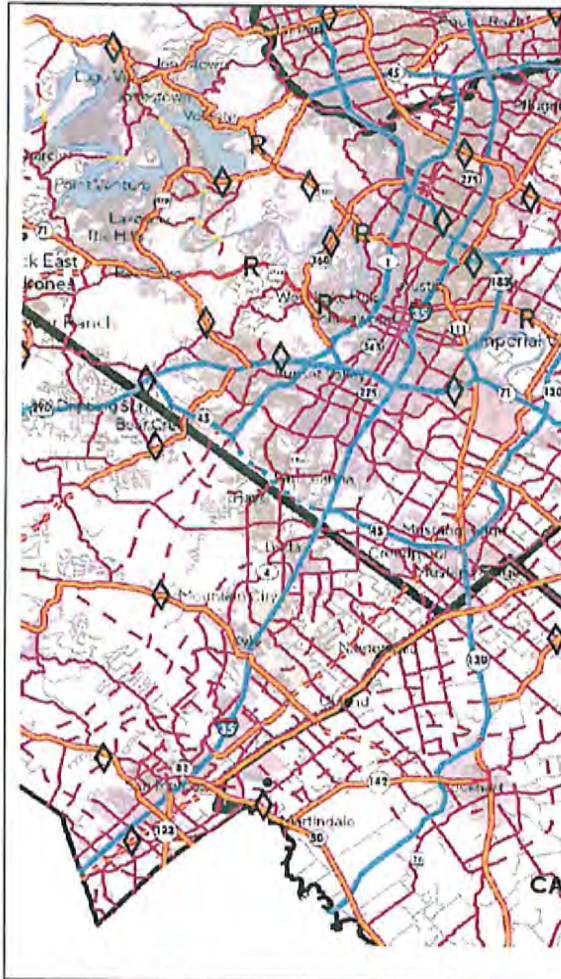
(4) As to the “Scenario B” map on p. 9 of the “Arterials Boards”:



(a) "Scenario B" does not show the now opened SH45SW, but instead proposes upgrading an additional potential through-traffic bypass from I-35 onto Loop 1 through Buda and Brodie Lane. The Regional Corridor Inventory provided to the City of Rollingwood only includes descriptions of projects in Travis County and the proposed "Scenario B" does not provide sufficient information for evaluating the impact of the proposed regional corridors in Hays County to connect to Loop 1. Again, the City of Rollingwood is opposed to converting Loop 1 into an I-35 bypass, to the detriment of local, daily traffic, which would be effected if Loop 1 is designed with multiple regional corridors directly connecting from I-35 South of downtown Austin, through Loop 1, to I-35 North of downtown Austin.

(b) "Scenario B" does not address the improvements needed for traffic flow east-west through downtown Austin on Cesar Chavez.

(5) As to the “Scenario C” map on p. 9 of the “Arterials Boards”:



(a) “Scenario C” provides a regional corridor for the traffic flow east-west through downtown Austin on Cesar Chavez, which the City of Rollingwood continues to support.

(b) “Scenario C” proposes a regional corridor that would extend a new facility through the entirety of Hays County, connecting to updated regional corridors at the southern tip of Hays County that would potentially directly connect to I-35. The Regional Corridor Inventory provided to the City of Rollingwood only includes descriptions of projects in Travis County and the proposed “Scenario C” does not provide sufficient information for evaluating the impact of the proposed regional corridors in Hays County to connect to Loop 1. Again, the City of Rollingwood is opposed to converting Loop 1 into an I-35 bypass, to the detriment of local, daily traffic, which would be effected if Loop 1 is designed with multiple regional corridors directly connecting from I-35 South of downtown San Marcos, through Loop 1, to I-35 North of downtown Austin.

II. The Regional Arterials Study for Improvements to Bee Caves Road (RM 2244)

Bee Caves Road is a main artery for east-west connectivity in western Travis County. The portion of Bee Caves Road that intersects the City of Rollingwood provides the main point of connectivity for access to the business district in Rollingwood and provides a main point of connectivity for pass-through traffic flowing between western Travis County and Downtown Austin.

In evaluating the Regional Arterials Study, the City of Rollingwood notes that TxDot is currently leading a gap project to improve the portion of Bee Caves Road within the Rollingwood City limits, spanning from the intersection at Rollingwood Drive to Montebello Drive. The planned improvements will increase the safety and mobility of Bee Caves Road through the addition of a center turn lane, shoulders, elevation of a low water crossing that is frequently closed during flood events, and addition of pedestrian support. With the completion of the Bee Caves Road project from 360 to Rollingwood Drive, the volume of traffic on Bee Caves Road is expected to increase, and the additional gap project

on Bee Caves Road through Rollingwood is planned to contribute additional safety features to support the additional traffic volume.

Additionally, in evaluating the Regional Arterials Plan, the City of Rollingwood notes the previously authorized divergent diamond at SL 360 and RM 2244 (Bee Caves Road) in the fiscally constrained portion of the 2019 UTP. Modifications to 360/2244 to the west of Rollingwood should be studied to evaluate the impact that changes in traffic flow at this intersection are likely to have to the volume of traffic anticipated on Bee Caves Road between SL 360 and MoPac.

At a general level, the City of Rollingwood is **not supportive** of the placing a reversible lane throughout RM2244 within the City of Rollingwood as proposed in “Scenario A”, “Scenario B”, and Scenario C” of the “Arterials Boards”, for several reasons.

First and foremost, Bee Caves Road is a winding urban road, with blind corners and blind horizons. Short of adding a significant number of traffic lights along Bee Caves Road through the City of Rollingwood, the presence of a bi-directional center turn lane provides a safety feature necessary for traffic to flow safely through the City and access both sides of Bee Caves Road.

Second, Bee Caves Road traverses the City’s business district, which provides the City’s only source of sales tax revenue. A reversible lane through the City would effectively bifurcate the business district and place additional barriers to customer access to the City’s businesses on both sides of the road, all times of day. While the City of Westlake Hills supports almost 70% of their annual budget from sales tax, the City of Rollingwood’s sales taxes comprise a significantly smaller portion of the City’s annual budget. The City of Rollingwood is less than 1 square mile and any barriers to customer access to the City’s business district have a direct, tangible impact to the City’s sales tax and to the viability of the small businesses in the City. For example, as the City of Rollingwood has commented on many times over the years, the road closure at Bee Caves and Mopac during special events at Zilker Park is a barrier to customers freely accessing the business district, which has a negative economic impact on the City. The City is concerned that a reversible lane would have a daily negative impact to its businesses similar to a special events road closure.

In addition, in an effort to increase the sales tax base of the City, the City of Rollingwood is in the process of engaging a firm to perform a Comprehensive Commercial Corridor Analysis, with plans to evaluate effective redevelopment of the City’s business district to increase sales tax. The City is beginning, in earnest, a plan to revitalize and promote redevelopment of the business district in an effort to increase sales tax in order to continue to provide city services, including police service for response on the Bee Caves Road corridor and Mopac frontage areas. The City of Rollingwood respectfully requests that if further evaluation of a reversible lane is to be considered, the City of Rollingwood and other stakeholders who would be directly impacted, would be provided multiple opportunities to review any proposed designs and evaluate any negative impacts to the businesses in the City.

III. The Regional Arterials Study for Improvements to Mopac and Mopac at Bee Caves Road

In evaluating the Regional Arterials Study, the City of Rollingwood notes that CTRMA is currently conducting the Mopac South Environmental Study, studying potential improvements to Mopac from Cesar Chavez to Slaughter Lane. The City of Rollingwood has participated in commenting on the Mopac South Environmental Study and has received comments in response from CTRMA. Attached to this letter is the following previous correspondence related to the Mopac South Environmental Study, which is incorporated by reference with the City's comments regarding the Regional Arterials Study:

- 04-01-15 - Letter from Rollingwood "Pros and Cons"
- 04-15-15 – City of Rollingwood Adopts Resolution opposing plans to construct elevated lanes
- 07-23-15 – Letter from Rollingwood Mayor Thom Farrell to TxDot, CTRMA and CTRMA
- 08-06-2015– Letter from CTRMA Executive Director Heiligenstein to Rollingwood Mayor Farrell
- 08-13-2015 – Letter from TXDOT Chief Planning and Project Officer Russell Zapalac
- 11-18-2015 - Letter from Rollingwood Mayor Farrell to CTRMA Executive Director Heiligenstein
- 03-07-2017 – Letter from Rollingwood Mayor McKee to CTRMA Executive Director Heiligenstein
- 04-05-2017 – Letter from CTRMA Executive Director Heiligenstein to Rollingwood Mayor McKee
- 11-27-2017 – Letter from Rollingwood Mayor McKee to CTRMA Executive Director Heiligenstein
- 12-20-2017 – Letter from CTRMA Executive Director Heiligenstein to Rollingwood Mayor McKee

In evaluating the Regional Arterials Study, the City of Rollingwood notes that the City has consistently voiced support for improvements to Mopac South that serve to increase mobility and safety, however the City has not supported roadway designs that place elevated lanes over Mopac. In addition, the City requested HOV and transit only lanes be evaluated as an alternative, prior to the November 2017 call by Governor Abbott for removal of all new toll road projects from the statewide transportation plan. In the 11-18-2015 letter from Rollingwood Mayor Farrell, the City of Rollingwood requested that CTRMA

“rigorously explore and objectively evaluate alternatives employing HOV, transit only lanes, and additional free lane capacity. In addition, HOV and transit only lanes should be compared with toll and general purpose lane options as part of the environmental study. This is especially true in light of the fact that 2040 traffic 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 respectfully notes that CTRMA has not yet provided an alternative as part of the Mopac South Environmental Study that focuses on HOV, transit only lanes or additional free lane

capacity. The City of Rollingwood notes that the Regional Arterials Study should include an evaluation of studying non-toll based alternatives for improving Mopac South to reduce congestion, particularly in the corridor from Cesar Chavez to 360.

In evaluating the Regional Arterials Study, the City of Rollingwood notes that CTRMA performed an initial evaluation of potential improvements to the Mopac/Bee Cave Road intersection (the “Bee Caves Road intersection”). The City of Rollingwood notes that in the 11-27-2017 letter from Rollingwood Mayor McKee, the City of Rollingwood asserts the Mopac South process and design should ensure that the Bee Caves Road intersection functions efficiently and can be improved in its existing configuration in the future. The City of Rollingwood appreciated CTRMA staff’s willingness to think creatively about how to improve the Bee Caves Road intersection for the present and future, but opposed the “Right-in Right-out” configuration presented by CTRMA that eliminated east-west connectivity, and opposes any changes to the Bee Caves Road intersection that would eliminate the east-west connectivity of the intersection.

In addition, in evaluating the Regional Arterials Study, the City of Rollingwood respectfully submits that roadway designs should prioritize mobility improvements to roadways that are most congested, using techniques that are shown to actually reduce congestion for our region, including TDM options such as lengthening on and off ramps in congested areas to mitigate bottlenecks. The City of Rollingwood notes that Texas’ Most Congested Roadways 2018 released by TTI, the 10.38 mile segment of Mopac from US 183 to Loop 360 is ranked in 2018, with toll lanes, as the 21st most congested highway, however the 7.51 mile segment of Mopac from Loop 360 to SH45 is only ranked as the 272nd most congested highway. CTRMA’s proposed alternatives in the Mopac South Environmental Study focus on providing toll lane drivers, to and from Slaughter Lane and Cesar Chavez, a 9-10 minute travel time by going around the significant congestion on Mopac between Cesar Chavez and Loop 360, rather than focusing on improving mobility for all drivers on Mopac between Cesar Chavez and Loop 360. The City of Rollingwood respectfully notes that the Regional Arterials Study should evaluate options for reducing congestion for all drivers on Mopac between Cesar Chavez and Loop 360. Furthermore, the City of Rollingwood respectfully notes that the Regional Arterials Study should avoid adding new roadways that effectively connect Mopac to I-35 through roadways that only serve pass-through traffic, rather than resolving congestion and safety issues for those who live and work in the City of Rollingwood and downtown Austin.

In addition, in evaluating the Regional Arterials Study, the City of Rollingwood notes that improvements need to be made to the Bee Caves Road intersection to improve the flow of traffic and pedestrian safety during Special Events at Zilker Park. The City of Rollingwood notes that during Special Events at Zilker Park, TxDot frequently allows traffic control plans that include closing down and re-routing the eastbound lane of Bee Caves Road as it intersects with Mopac in the Bee Caves Road intersection. The Bee Caves Road intersection and the Special Events at Zilker Park are outside the Rollingwood City limits, however, TxDot allows the City of Austin to close the intersection and reroute traffic at the intersection during special events in a configuration that significantly shifts traffic impacts onto Bee Caves Road into the City, impeding regular access to the business district in Rollingwood and causing a negative economic impact to the City’s businesses and sales tax revenue. For example, during the Trail of Lights event at Zilker Park, in 2018 the City of Austin closed the eastbound lane of the Bee Caves Road intersection and rerouted traffic on all access points to the intersection for 14 consecutive days, at peak evening rush hour, causing substantial traffic delays for the traveling public within miles

of the closure. Zilker Park also annually hosts other large scale events including the Austin City Limits Festival, Kite Festival, Blues on the Green, and Zilker Hillside Theatre Events, effectively providing the functional capacity of Darrell K. Royal Texas Memorial Stadium and the Frank Erwin Center in a park setting. In evaluating the Regional Arterials Study, the City of Rollingwood notes that improvements to the Bee Caves Road intersection should evaluate traffic levels and impacts due to Special Events traffic and consider improvements to safety and mobility in this area, without eliminating existing connectivity.

Finally, in evaluating the Regional Arterials Plan, the City of Rollingwood notes that improvements need to be made to Southbound Mopac between Enfield Road and Bee Caves Road to mitigate the impact of CTRMA reassigning a general purpose lane to traffic exiting from the southbound toll lane. The City of Rollingwood notes here, and in the 11-27-2017 letter from Rollingwood Mayor McKee, that this reassignment has introduced a new bottleneck into the general purposes lanes of southbound MoPac, causing more travel delays for southbound traffic exiting at Bee Caves Road into the City's commercial and residential areas. The City of Rollingwood has experienced a significant increase in cut-through, high-speed traffic on multiple residential streets, many of which have not formerly experienced any cut-through traffic, as a direct result of drivers attempting to find alternate routes to avoid the bottlenecked congestion introduced by the Winsted entrance ramp lane reassignment.

IV. The Regional Arterials Study for Traffic Dampening and Safety Improvements to Rollingwood Drive

Rollingwood Drive is a residential street, accommodating 84 homes, including 68 driveways directly connected to Rollingwood Drive. Rollingwood Drive provides the primary vehicular and pedestrian connectivity point to Rollingwood Park and the Zilker Nature Preserve. Rollingwood Drive has heavy use by pedestrians and cyclists alike; on weekends, the cycling traffic increases significantly as large riding groups traverse through Rollingwood to connect to cycling routes in Western Travis County. Rollingwood Drive is the shared route for all school-aged residents who cycle to Hill Country Middle School and Westlake High school.

The majority of Rollingwood Drive does not include sidewalks, requiring pedestrians and cyclists use the shoulders of the roadway for passage. In 2017, the City of Rollingwood completed a street striping project to add striped shoulders to Rollingwood Drive, as a way to delineate pedestrian and cycling shoulder areas and to visually narrow the road for traffic dampening.

The speed limit on Rollingwood Drive is set to 30 mph, with a segment of Rollingwood Drive adjacent to Rollingwood Park marked as a park zone with a 25 mph speed limit. The park zone was implemented in 2010 in an effort to promote safety on Rollingwood Drive and also to encourage pass-through traffic to route through Bee Caves Road, which has a speed limit of 40 mph, intersects the City's business district, and is a 4 lane highway for accommodating pass-through traffic.

Recently, changes to the configuration of Mopac North with the addition of toll lanes and new bottlenecks have directly caused a significant increase in the amount and speeds of pass-through traffic on all residential streets in Rollingwood, including Rollingwood Drive. The City of Rollingwood and its residents plan for Rollingwood Drive to continue to function as a residential street, purposed for

residential and pedestrian/cyclist traffic, and desire to further promote the routing of all pass-through traffic to Bee Caves Road through increased traffic dampening measures to discourage high-speed pass-through traffic on residential streets. The City of Rollingwood plans to go out for bids in 2019 for a corridor study of all streets in the City of Rollingwood and to evaluate additional options for traffic dampening and safety improvements to residential streets.

In evaluating the Regional Arterials Study, the City of Rollingwood notes that additional traffic dampening and safety measures are needed on Rollingwood Drive, and connecting residential streets, to maintain the residential character and safety of Rollingwood Drive by promoting routing of pass-through traffic to Bee Caves Road, while maintaining all current connectivity points to the City for residential and bike/pedestrian uses. In addition, the City of Rollingwood notes that adjustments to the infrastructure of roadways adjacent to the City of Rollingwood are needed to provide improved direct connectivity points from Barton Springs Road and Mopac for pass-through traffic to access Bee Caves Road or Loop 360 for east-west travel in Travis County.

V. The Regional Arterials Study for Improvements to Cesar Chavez

Cesar Chavez is an important downtown connectivity point for commuters traveling between Downtown Austin and the City of Rollingwood. While the distance of the commute between the Bee Caves Road exit and the Cesar Chavez exit on Mopac is less than a mile, the travel time delays between these two exits, along with the travel time delays on Cesar Chavez into and out of Downtown Austin, continue to increase and the length of time on weekdays considered “rush hour” in this area also continues to increase. The recent changes to the configuration of Mopac North to add toll lanes, without also improving Cesar Chavez, have only lengthened commute travel times and lengthened the amount of time on week days deemed “rush hour” conditions. The Mopac South Environmental Study includes multiple alternatives with direct connects that would funnel even more traffic directly onto Cesar Chavez as a primary access point into Downtown Austin. In response to questions about the impacts of the proposed direct connect alternatives on Cesar Chavez, CTRMA performed traffic studies and has articulated that the plan for managing the increase in toll lane traffic directed to Cesar Chavez is for general lane drivers to find an alternative route into downtown, rather than improving Cesar Chavez to handle toll lane directed traffic.

In evaluating the Regional Arterials Study, the City of Rollingwood notes that additional mobility improvements are needed on Cesar Chavez to accommodate current traffic levels and to handle the anticipated increases in traffic levels due to predicted increases in overall traffic in the region, and that plans would include increased mobility on Cesar Chavez to handle both general lane drivers and toll lane drivers if toll lanes are added to Mopac South.

VI. The Regional Arterials Study for Improvements to Pedestrian and Bike Pathways

The City of Rollingwood notes that the “Arterials Boards” (page 2) states:

“The Regional Arterials Study is just one piece of the upcoming CAMPO 2045 Plan. The CAMPO 2045 Plan will be multimodal in nature, meaning it will include driving, walking, biking, transit, and using technology and travel habits as options to help meet the region’s transportation needs.”

The City of Rollingwood looks forward to viewing proposed multimodal improvements, integrated into arterial improvements, as part of the CAMPO 2045 Plan.

For example, the City of Rollingwood looks forward to the addition of bike and pedestrian Infrastructure to provide consistent, direct access to and from downtown Austin as part of the Mopac South improvements. The addition of infrastructure for bike and pedestrian from the south side of Barton Springs to the north side of Barton Springs and from the north side of Barton Springs to Stratford drive, parallel with and proximate to Mopac, will help address special event traffic issues around and near Zilker Park and Barton Springs Road and may minimize the need for temporary road closures and barricading during special events by providing separate, permanent facilities for bike and pedestrian traffic across Barton Springs Road. In addition, the City of Rollingwood looks forward to the CTRMA proposed addition of a multi-use path on the southbound side of Mopac that will accommodate both bikes and pedestrians and will connect and seamlessly with Phase III of the Mopac bicycle and Pedestrian project.

As previously noted, the City is working with TxDot on improvements to Bee Caves Road and looks forward to working with local and regional partners to integrate shared used path into the improvement plan to support future bike and pedestrian traffic and increase connectivity to other bike and pedestrian paths in the area. Bee Caves Road is a major artery into Mopac South and there is a need for consistent, east to west direct bike and pedestrian on Bee Cave Road. A successful urban city today is one that embraces trails, bike lanes, sidewalks, and encourages alternatives to driving. We look forward to working with you to be a constructive part of the solution and thank you again for the opportunity to comment.

Sincerely,



Michael R. Dyson
Mayor
City of Rollingwood

cc: Gerald Daugherty, Travis County Commissioner, Precinct 3
Tucker Ferguson, P.E., Austin District Engineer, Texas Department of Transportation
Mike Heiligenstein, Executive Director, Central Texas Regional Mobility Authority
Linda Anthony, Mayor, City of West Lake Hills
Steve Adler, Mayor, City of Austin