

Appendix P

Agency Comments on Draft Purpose & Need

From: Cannon-Mackey, Shari
Sent: Monday, March 30, 2015 1:59 PM
To: Norman, Haley L
Subject: FW: SWF-2014-00491; LSRRP

Shari Cannon-Mackey
Burns & McDonnell

-----Original Message-----

From: Cannon-Mackey, Shari
Sent: Friday, February 20, 2015 3:09 PM
To: justin.ham@dot.gov; Melissa Neeley-TxDOT
Cc: 79521; tom.bruechert@dot.gov; Mark Werner (Mark.Werner@txdot.gov);
cameron.muhic@txdot.gov
Subject: FW: SWF-2014-00491; LSRRP

-----Original Message-----

From: Messer, Darwin O SWF [<mailto:Darvin.Messer@usace.army.mil>]
Sent: Friday, February 20, 2015 1:04 PM
To: agency.comments@lonestarrail.com
Subject: SWF-2014-00491; LSRRP

USACE has no comments on the draft purpose and need.

Darvin Messer
Regulatory Project Manager
USACE Fort Worth District
PO Box 17300
819 Taylor Street
Fort Worth, TX 76102
817-886-1744
817-886-6493 - fax
darwin.messer@usace.army.mil

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http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey



February 23, 2015

Mr. Joseph Black
Rail Director
Lone Star Rail District
P.O. Box 1618
San Marcos, TX 78667

RE: Lone Star Regional Rail EIS, Agency Scoping Comments

Dear Mr. Black:

Lone Star Regional Rail is a key component of the Project Connect Transit Plan, and Capital Metro is pleased to see that the project has made a significant step forward with the Federal Highway Administration's initiation of the environmental process. This letter constitutes our agency's scoping comments for the initial purpose and needs identified for the proposed project, within the agency scoping meeting presentations dated December 4, 2014 and January 13, 2015.

The first need identified by your project team is "worsening mobility due to growing travel demand." Your team's agency scoping presentation highlighted the issues of growing travel demand and congestion, in terms of current (2010) vehicles per day as well as forecasted vehicles per day (2030). Since the Rail District was formed and initial studies were conducted in the late 1990s, we suggest that you evaluate travel demand and congestion starting with these initial studies. We believe this trend analysis will clearly indicate that the I-35 corridor has not been able to address growing travel demand and congestion. Furthermore, this analysis would likely indicate the need for "congestion proof" travel alternatives along the I-35 corridor and its adjacent municipalities. As you know, the public process for the Project Connect Transit Plan found that this region desires "congestion proof" travel alternatives.

The second need identified is "lack of mode options and travel reliability." Your team's agency scoping presentation highlighted the issue of limited public transit options for key travel markets along the I-35 corridor, including major schools, medical centers, and job centers. We believe a key component of this need analysis should include the locations of low- and moderate-income populations whose incomes are negatively affected by the region's auto-dependent land use patterns that hinder "ladders of opportunities." As you may know, there are many initiatives in this President's Administration that aim to improve low- and moderate-income populations' access to education, jobs, and health care. Unfortunately, the significant increases in housing costs and property taxes in Austin over the last 5-10 years have caused these same populations to disperse to suburban areas for more affordable housing, which is adding to the region's growing travel demand and congestion. Viable transit alternatives are needed in this region to offer better travel reliability between its centers of education, jobs, and health care.

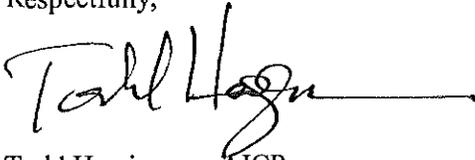
The third need identified is “lack of regional connectivity and accessibility.” Your team’s scoping presentation contained statistics for regional growth, county level growth, and municipal growth. However, these statistics did not highlight 2010 U.S. Census data for San Antonio and Austin, which rank them as 7th and 14th largest U.S. cities respectively. More recent U.S. Census estimates (July 1, 2013) now rank Austin as the 11th largest city. Yet, both cities combined have only 32 miles of commuter rail, Capital Metro’s Red Line. Compared to national peer cities, San Antonio and Austin are clearly lacking in transit connectivity and accessibility. Our populations deserve the “freedom of choice” to travel without the stress of congestion, lost productivity, road rage and accidents.

The fourth need identified is “regional growth and economic development.” Central Texas has spent considerable time and money developing regional and municipal plans with policies to connect activity centers (CAMPO’s 2035 Regional Transportation Plan), to become “compact and connected” (Imagine Austin Comprehensive Plan), and to offer more regional transit alternatives for our activity centers (Project Connect Transit Plan). Many of our surrounding municipalities also adopted comprehensive plans or area plans that promote transit-oriented development. We believe these plans should serve as a foundation in understanding how our metropolitan area wants to address regional growth and economic development – with major transit investments and more compact growth.

Lastly, as it relates to processes specific to our agency that may need to be addressed, Capital Metro looks forward to actively participating in the environmental process as a representative to a technical advisory committee(s). Capital Metro, City of Austin, and the Rail District cooperatively developed the Project Connect Transit Plan, and we look forward to refining the Lone Star Regional Rail element of this Plan. In addition, Capital Metro has completed the North Corridor Plan of Project Connect and will soon initiate the Central Corridor Comprehensive Transit Analysis. Both of these corridor study areas are connected with the proposed Lone Star Regional Rail and its station areas, which require further analysis and consideration in light of local transit initiatives. Finally, Capital Metro will begin our update process this year for Service Plan 2020, which is updated every five years and guides our local transit services and capital improvements.

We would look forward to being an active participating agency in the Lone Star Regional Rail EIS. Please contact me or Joe Clemens, Senior Planner – Long Range Planning, for any clarifications on our agency comments and for future coordination.

Respectfully,



Todd Hemingson, AICP
Vice-President Strategic Planning & Development
Capital Metropolitan Transportation Authority

cc: Linda Watson, President/CEO
Gerardo Castillo, Chief of Staff
Christy Willhite, Government Relations



Austin Transportation Department

P.O. Box 1088
Austin, TX 78767
(512) 974-1150, Fax (512) 974-1171

February 27, 2015

Justin Ham
Urban Engineer
Federal Highway Administration
Texas Division

Dear Mr. Ham,

The City of Austin is pleased to provide the following comments regarding the draft Purpose and Need Statement for the Lone Star Regional Rail Project Environmental Impact Statement (EIS).

The City of Austin believes the draft Purpose and Need is reasonably consistent with the vision of the Imagine Austin Comprehensive Plan, emphasizing connectivity and prosperity. We think Austin, the greater metropolitan area, and the overall IH 35 corridor would also benefit from additional emphasis in the purpose and need on other shared priorities, including affordability, (higher) education, and compact development patterns around defined local and regional centers.

The City of Austin offers the comments below for consideration. While the focus of our comments primarily reflects the interests of the City and those within the region, we do recognize the benefits of connecting the regions of Austin and San Antonio, as well as the interests of the many other stakeholders in this process.

- General:
 - Suggest adding greater specificity to the Purpose and Need Statement presented to the public.
 - Suggest that several key concepts be better defined, as shown below;
- Purpose:
 - “Improve mobility” The City of Austin and the CAMPO region have a well-documented and widely accepted need for improved mobility within the Austin metropolitan area. We have a critical need for improved mobility during peak commute times. Therefore, we suggest emphasizing mobility *within* the CAMPO region, in addition to mobility *between* Austin and San Antonio.
 - “Improve mode choice” We support improving mode choice and would suggest a greater emphasis on choice for commute trips.
 - “Improve accessibility” We suggest use of the term “access” rather than “accessibility”, as the latter is often used in the context of disability. Access is typically the *goal* with mobility as the *means*; therefore, access is a more appropriate purpose. Access also relates directly to development patterns, upon which this project is anticipated to have a beneficial impact.

- “Improve transportation reliability” We wholeheartedly support this project purpose and would like to see as congestion-proof a project as achievable.
- “Facilitate economic development” While we support this proposed purpose, we suggest expanding it to include sustaining economic health. This would better reflect the concerns of our community as the adverse impacts of worsening traffic congestion threaten our prosperity.
- In addition to the refinements listed above we suggest the following project purposes for consideration:
 - “Improve safety” The City is taking an aggressive approach to traffic safety and has recently launched a Vision Zero Task Force. Therefore, we would like to see every project that addresses mobility endeavor to improve safety for the traveling public and residents of this community.
 - “Improve air quality” While identified as a need, we suggest including air quality improvements in the project purpose given the potential air quality benefits of this project due to potential reductions in and/or the growth of local and regional vehicle miles traveled (VMT).
 - “Improve connectivity to existing transit systems” We suggest the proposed project also focus on improving connectivity to the existing transit system and help build out a robust regional transit system.
- Need: We generally concur with the proposed needs for the project and suggest the following comments for consideration:
 - “Affordability” This is arguably the most pressing need in Austin. Rail transit’s ability to directly address household affordability by lowering transportation costs makes this project especially important to the City.
 - “Development patterns” The well-documented ability of fixed guideway transit to shape development patterns is of keen importance to the City. As noted above, the proposed project is very consistent with our Imagine Austin Comprehensive Plan, as well as other adopted plans along the IH 35 corridor, and we strongly encourage the explicit inclusion of the need to reinforce and implement those plans and specifically the compact and connected development patterns.

Thank you for the opportunity to provide comments on the draft Purpose and Need Statement as part of the Lone Star Regional Rail Project EIS. We look forward to continued involvement as a participating agency.

Sincerely,



Robert Spillar, P.E.,

Director

Austin Transportation Department