



## Stakeholder Questions / Project Team Responses August 26, 2014

### **1. Who actually designed the decision matrix and what methodology was used?**

The decision matrix was developed by Rodriguez Transportation Group, Inc. (RTG), an Austin transportation engineering firm, their team of consultants including HDR Engineering, Cox|McLain Environmental Consulting, Nancy Ledbetter & Associates, H&H Resources, K Friese & Associates, and RVI Planning, in conjunction with the TxDOT Austin District, Mobility Authority, Texas Department of Transportation (TxDOT) Environmental Affairs Division and the Federal Highway Administration (FHWA). RTG is the consultant under contract with the TxDOT Austin District to complete the environmental study and design schematic.

The methodology used follows the guidelines for an Environmental Study. An Alternatives Analysis whitepaper issued by FHWA's Office of the Chief Counsel (HCC) on September 22, 2010 is provided for your convenience.

The white paper states that a proposed project must meet the purpose and need to continue for further study:

“The environmental documentation, be it an EA or EIS, “shall briefly specify the underlying purpose and need to which the agency is responding in proposing the alternatives including the proposed action.” Since the case law is clear that an alternative is unreasonable if it does not meet the project’s purpose and need (P&N), it is important to carefully craft a statement outlining what the needs or problems are that require the project, and how the project will remedy those problems – i.e., the project’s purposes.” p. 2

The white paper further states that concepts can be reduced during a screening process:

“The number of alternatives studied in detail in an EIS may be reduced through a screening process conducted during scoping. Likewise, if there is a very broad or vast number of alternatives, the document can look at a reasonable range within those. While there is no standard methodology for such screening, HCC recommends a systematic process that eliminates those alternatives that obviously cannot meet the P&N; those with known major environmental problems; those that are not technically or economically feasible (as contrasted to simply not desirable); and those that are substantially similar to other alternatives already under consideration.” Pg. 3-4

The white paper also points out that the screening process takes place before undertaking the environmental impact study.

“Since this screening is performed prior to undertaking the actual study of environmental impacts, the level of detail involved need not approach that of the EIS. The critical points are that the methodology selected be reasonable and that it be documented.” p. 4

### **2. Is the decision matrix fair, balanced and does it consider all important elements in its analysis of the different proposed alternatives for the Oak Hill Y?**

Yes. At the beginning of any environmental study, a Purpose and Need (P&N) is developed to guide the decision making process. The P&N was developed in collaboration with Federal Highway Administration (FHWA), Texas Department of



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Transportation (TxDOT), Central Texas Regional Mobility Authority (Mobility Authority), the public and the Cooperating and Participating Agencies (City of Austin, Travis County, Capital Metro, US Environmental Protection Agency (EPA), Texas Parks and Wildlife Department, US Fish and Wildlife Service (USFWS), US Army Corps of Engineers, and the Texas Historical Commission. Invitation letters along with the Public and Agency Coordination Plan were sent to the Cooperating and Participating Agencies inviting them to the November 15, 2012 Public Scoping Meeting where the draft P&N was presented for comment. It was also reviewed during the January 22, 2013 Agency Coordination Meeting (attended by City of Austin, Travis County, Capital Metro, USFWS, Texas Commission on Environmental Quality, TxDOT, FHWA, and the Mobility Authority).

The P&N for the Oak Hill Parkway project are:

NEED: What are we trying to solve?

- Traffic congestion related to population growth – Travis County has grown from 212,000 in 1960 to just over 1 million in 2010 (US Census Data, 2013)
- Crashes on US 290/SH 71 West – 304 crashes occurred between 2009-2011, resulting in one fatality, nine incapacitating injuries, other injuries and property damage (TxDOT, 2013)
- Lost time – Drivers waste more than 340,000 hours per year stuck in traffic (Texas Transportation Institute, 2011)
- Lack of reliable connectivity
- Unreliable route for transit and emergency vehicles

PURPOSE: What are we trying to do?

- Improve mobility and operational efficiency
- Promote long-term congestion management
- Increase multimodal travel options for people and goods
- Improve safety
- Improve emergency response

The Rodriguez Transportation Group team, TxDOT, Mobility Authority and FHWA developed a two-phase evaluation screening process. The initial screening determined whether each concept met the P&N for the project. The secondary screening determined which concepts best meet the P&N and should advance to detailed schematic development and analysis. We continued to ask the public about the evaluation criteria. Eighty people responded to a survey that was provided at an Open House and concurrent Virtual Open House in November 2013. 64% of respondents stated they agreed or strongly agreed that the process for evaluating the concepts was appropriate. 59% of respondents stated that the evaluation criteria for the project were appropriate. (See attached Oak Hill Parkway Community Survey Results – November 2013)

***3. You said, “The criteria was updated and revised based on public comment and input from oversight and partnering agencies, and the concepts were screened in conjunction with FHWA, TxDOT Environmental Division and TxDOT’s Austin District,” but the agencies’ input and the methodology of structuring the decision matrix was not mentioned. I was unable to find the actual decision matrix on the Oak Hill Website and I’d like to see how it was structured and weighted. A simple “yes” or “no” answer to a list of questions, at first blush to me, doesn’t sound appropriate for a very complex project. There are plenty of analysis methodologies that will consider the multiple complexities and weight them accordingly.***



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The evaluation screening process and criteria can be found at <http://www.oakhillparkway.com/news/files/virtual-open-house-evaluation-criteria.pdf>. These matrices were developed with input from the Federal Highway Administration, the Texas Department of Transportation and the Central Texas Regional Mobility Authority, and screened against the Purpose and Need (P&N) for the project. Transportation Demand Management (TDM), Transportation System Management (TSM), E-1 (minimum improvements at William Cannon Drive and SH 71) and E-2 (minimum improvements at William Cannon Drive) were eliminated during the initial screening because they did not meet the P&N of the project.

The secondary screening criteria are not weighted but provide a high level analysis of how well a concept would function operationally. Other performance measures, such as emergency response, displacements, and utility costs were also examined. The point of the secondary screening is to determine which concepts will be developed into alternatives for detailed study in the Environmental Impact Statement. All the concepts were screened at a comparable level of detail to avoid any indication of a bias towards a particular concept. After the secondary screening, only Concepts A and C were advanced, along with the No-Build alternative.

***4. A managing authority can take feedback from multiple public meetings and massage it in a way that works best for the agencies (and/or engineering firms) involved. In fact, TXDOT has a history of doing this — the previous design for the Y is an example of this — and, in the current climate of distrust of public agencies and their processes, it seems that CTRMA would be interested in sharing its analysis methodology in order to avoid transparency issues and truly gain the confidence of the public. Also, the public generally is war-weary from this process and it takes them time to process and respond to the outcomes — even with the better public outreach offered by the most recent Oak Hill process. By the time they have processed new information, the meetings are often over and the opportunity to respond has been missed. Perhaps in the future letting the public know in advance, more detail about the methodology of how options will be analyzed, might actually help the public process move more smoothly.***

Since the Oak Hill Parkway project study began in August 2012, more than 650 people have signed in to participate in various public outreach efforts, including 4 Open Houses and Virtual Open Houses, 7 issue-specific workshops and nearly two dozen stakeholder meetings. The project team has conducted this study as a community-driven effort. The public has been consulted regularly for their comment and input. A summary of the information that has been presented at various Open Houses and workshops can be accessed here on the website: <http://www.oakhillparkway.com/environmental/public-input.php>

Specifically, one of the display boards presented at the October 2013 Open House and concurrent Virtual Open House explained that the public was being asked to not only review improvement concepts, but also provide input on concept evaluation criteria.

We continuously look for ways to enhance our public outreach efforts to ensure that the public can meaningfully participate in the process.

***5. It's officially called the Oak Hill Parkway. Why was the only alternative that remotely resembles a parkway disqualified from further consideration? Why was this project allowed to be named something that NEPA classifies as a "predetermined outcome?"***



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In August 2012, a workshop was attended by approximately 40 members of the public to develop a community-branded name and identity for the project as well as provide an opportunity for the Texas Department of Transportation (TxDOT) and the Central Texas Regional Mobility Authority to hear ideas and concerns directly from citizens. Attendees discussed what they considered to be Oak Hill's defining characteristics and brainstormed a list of potential names for the project. Attendees voted for their favorite names. The general public was then given the opportunity to vote on the names generated during the workshop, including:

- Oak Hill Parkway
- Oak Hill Gateway
- Oak Hill Connection
- Oak Hill Way
- Convict Hill Parkway
- Gateway Oak Hill

Any road can be called a parkway. The word "parkway" is a generic term often used, but not necessarily synonymous with expressway, freeway or interstate. Currently there are 7 roadways officially designated as parkways by TxDOT.

- Beltway 8 (Harris County) – Urban multi-lane divided toll road with overpasses. Restricted access with and without continuous frontage road.
- The Bishop Ernest T. Dixon, Jr. Memorial Parkway (San Antonio) - Suburban/rural multi-lane divided roadway with at grade intersections. Open access with driveway connections to the main lanes.
- Patriot Parkway (Dallas) – Suburban multi-lane divided roadway with overpasses. Restricted access roadway without continuous frontage roads.
- Ralph L. Lowe Parkway (Houston) – Suburban multi-lane undivided roadway with at grade intersections. Open access with driveway connections to the main lanes.
- Big Thicket National Preserve Parkway (East Texas) – Urban multi-lane divided roadway with overpasses. Restricted access roadway with and without continuous frontage roads.
- NASA Parkway (Houston) – Urban multi-lane divided roadway with overpasses. Restricted access roadway with and without continuous frontage roads.
- Chisholm Trail Parkway (Fort Worth) – Suburban multi-lane divided toll road with overpasses. Restricted access with and without continuous frontage roads.

The name of this study, "Oak Hill Parkway" would not pre-determine the outcome of the study. NEPA guidelines are being followed to arrive at an outcome.

**6. Two key community design concepts were not included in Alternative F that would have allowed this alternative to have significantly higher marks in the decision criteria. The travel time for Alternative F was 58 percent greater than the other alternatives because an identified congestion solution was not included in TxDOT's Alternative F for the "Y" interchange. In TxDOT's Alternative F, the inbound SH71 to eastbound US290 connector joined the main lanes on US290 from the left creating a perilous weave to get to the William Cannon exit immediately on the right. At previous Alternative F subcommittee meetings the community had suggested an alternative that would access the main lanes on the right, eliminating this conflict. Modification to the currently proposed Alternative F would mean that travel times would compare similarly to the other alternatives. The other key design concept not included is discussed in item 6.**

We reviewed the comment summaries from the October 22, 2013 and May 23, 2013 Open Houses as well as notes from the August 21, 2013 stakeholder meeting with the Fix290 Coalition We did not see, nor do we recall, any specific



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suggestions to an inbound SH 71 to eastbound US 290 connector joining the main lanes on US 290 from the left or the right. There were no comments about any “perilous weaving” issues in relation to connectors either.

The suggestion contradicts the plan prepared by Fix 290 and other notes and emails from Bruce Melton requesting only one overpass at the “Y.” The plan presented by the Fix 290 Coalition depressed the main lanes of westbound US 290 so that the eastbound US 290 connector to SH 71 would not have to be elevated. Providing the SH 71 connector to the outside of US 290 would have required an additional elevated overpass over the eastbound US 290 main lanes, connecting further east (to make the profile grade work) than the current design of Concept F. It would also have to merge with the entrance ramp from Wolf Creek Pass to provide a single entrance to eastbound US 290. Regardless if this was previously requested or not, this plan would result in a weave length shorter than the current design, making the conflict worse. This is not a viable option without eliminating the exit ramp to William Cannon Drive.

Attached are our notes from the project team meetings with the Fix 290 Coalition on July 12, 2013 (Fix 290 Coalition presented its ideas for a new concept) and August 21, 2013 (initial draft of Concept F was provided to the Fix 290 Coalition for review).

***7. Cost: Alternative F is 23 to 37 percent less costly than the other alternatives. But there are large discrepancies in the cost evaluations used to perform this decision exercise. Total costs for the other alternatives considered are between \$250 and \$280 million, whereas Alternative F is \$204 million. Also of importance when evaluating costs, this decision process has only considered about 40 percent of the total costs for this project estimated in 2007 to be approximately \$640 million. The TxDOT/CTRMA answer to “why” these other costs were not considered is that they were largely identical across the alternatives. This is not an accurate statement as can be seen in following examples. Because Alternative F has a smaller footprint: a larger area immediately adjacent to the roadway is available for stormwater quality treatment and flood prevention creating lower costs; utility relocation is easier creating less cost; etc.***

We are at a conceptual design stage of the study process. For informational purposes, the project team displayed some estimated costs on the Phase 2 evaluation screening matrix for additional right of way that would be needed for each mobility concept (not acquired to date) and the construction costs of work items. However, cost should not be a determining factor at this phase of the study.

Other costs associated with the project, such as Preliminary Project Development, Environmental, Final Design, Actual Right of Way, Utilities, Construction and Contingencies, were not determined, because cost is not a part of the decision process at this phase of the study.

At this point in the process, conceptual designs are moved forward or eliminated based on their ability to best meet the Purpose and Need (P&N) of the project. Cost can be a factor after a concept has met the P&N and the schematic has been developed.



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Significantly more detailed total project cost estimates will be prepared for the alternatives advancing as they are studied in further detail. The construction costs presented represent preliminary roadway and bridge items on a square footage basis. The estimated costs presented do not include other project costs due to not having sufficient details to determine them.

***8. The “Utility Relocation” criteria was failed by Alternative F, yet no evaluation of what or why it failed was done.***

The “Minimize Utility Relocation Cost” criterion in the evaluation matrix is shown under the “Preliminary Project Cost” performance measure. None of the Preliminary Project Cost criterion was used in the screening, but they were provided as information. Detailed utility relocation cost estimates have not been performed for the preliminary concepts. They were judged medium or high based on whether they would require relocating a large electric transmission line north of Williamson Creek. Most of the concepts are within existing right of way (ROW), and utility relocations are expected to be lower for concepts that more closely follow the existing ROW. The area north of Williamson Creek is an exception, however, for several of the concepts. Concepts B, C, D and F would require that transmission line to be relocated, thus they would likely incur a higher cost than the other concepts. This information was not used in the screening of the concepts.

***9. The decision matrix treats the Alternative F unequally to the other alternatives when considering travel times. Twenty percent of the decision categories are based on continuous frontage roads to compare the other alternatives to Alternative F. Alternative F has no continuous frontage roads. This created 4 of the 19 total possible decision outcomes as N/A for Alternative F. Statistically, this creates a significant bias against Alternative F in the decision process.***

The CAMPO travel demand model was used for projecting future traffic volumes under various alternative scenarios. This macro-scopic model does not specifically consider the intersection delay produced at signalized intersections but rather considers forecasted “link” delay under congested conditions during the equilibrium traffic assignment. In order to evaluate operational measures such as Level of Service (LOS), delay, speed, and travel-time on both the main lanes and frontage roads for each alternative, a micro-simulation traffic model was prepared for each alternative to evaluate such measures. The micro-simulation software, Corsim, was used for this purpose. As part of the operational evaluation, the travel times for main lanes and frontage roads were estimated. Travel-time is a measure of effectiveness that is easily understood and is widely used for alternative analysis in transportation projects. The evaluation of travel-time was not meant to target the lack of frontage roads for Concept F, but rather to understand the frontage road operations for each alternative. The notion that there is a bias against Concept F is not accurate. Although there were 4 out of 19 total decision outcomes that Concept F was not able to show positively in, there were also 4 out of 19 total decision outcomes that Concept F was not considered if it had showed negatively in. Therefore, the “N/A” shown in the matrix is more accurately described as a neutral attribute rather than a biased one.

An inherent characteristic of Concept F is that there are no continuous frontage roads, thus making the evaluation of the travel time on frontage roads along the project length impossible for this concept. These 4 possible decision outcomes



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were not counted against Concept F. The travel time along the eastbound main lanes of US290 was shown to score lower than the other concepts. Since the travel time along the frontage roads for some of the sections of Concept F could not be determined (because there are not continuous frontage roads), an additional analysis was conducted for alternatives A, C, and F to evaluate the study area's network-wide delay during the afternoon peak period. The purpose of this additional analysis focused on comparing each alternative's effects of travel delay on the surrounding network as a whole. Therefore, the presence of frontage roads does not make a difference in this evaluation. A screenshot of the surrounding network or "study area" used in this analysis is provided in Exhibit A. As shown in this exhibit, additional roadway network links such as Southwest Parkway, RM 1826, Nutty Brown Road, and Circle Drive are present in this analysis. The delay for each link was calculated based on each link's total vehicle miles of travel, free-flow speed, and congested speed. The average computed values for all links were then calculated for the concepts. The results of this analysis indicate that the overall average link delay (within the study area) is as follows: Concept A: 31.04 hours, Concept C: 33.56 hours, and Concept F: 34.00 hours.

***10. Emergency Access: Alternative F failed this item, but there were no quantitative aspects to this decision criteria, only the simple evaluation statement "Does this route serve as a reliable route for emergency response organizations. This criteria also asks, "Adequate ramps and detour route for emergency vehicles or alternate route due to accidents [are included in the alternative]." Alternative F has 18 access ramps, the two chosen Alternatives A and C have 12 and 10 respectively. Alternative F has 50 and 80 percent more access ramps than the two chosen alternatives. (This statement considers the project from Scenic Brook to the existing main lanes improvements at Joe Tanner Lanes. The remainder of the project westward is identical in all alternatives as the community was not allowed to offer suggestions for improvement in this area because it was added to the process after the community involvement stage in Alternative F.) Also not objectively evaluated in the decision process and relative to emergency access, Alt. A and C prohibit main lane access from the Scenic Brook and US71 intersection whereas Alternative F has direct access. Part of the emergency access discussion considers the main lanes being completely blocked by an accident, but no consideration was given to a complete blockage of the frontage roads. Detour routes were cited in the meeting as being of significant concern, but there was no objective (quantitative) evaluation of travel time for any detour routes. There was also no objective evaluation of emergency access relative to the number of households that would be impacted by Alternative F as compared to the other alternatives. This subjective evaluation criteria creates a significant bias against Alternative F.***

It is intuitive that a highway system without easy alternate routes, such as a parallel frontage road, will not perform well during an accident event on the highway. If main lanes are blocked by an accident, vehicles must use exit ramps prior to the accident. If these exits lead only to local streets and thoroughfares, they will not handle the overload of traffic as well as a parallel, continuous frontage road system will. The fact that Concept F includes more total access ramps does not fix this situation. To support this assertion, our team has used the CAMPO 2035 traffic demand model for the study area to determine the total hours of delays on the roadway network within the study area if such an event were to occur. A network-wide delay analysis was completed that is similar to the analysis done as a result of Question 9's response. However, the US 290 westbound main lanes located west of RM 1826 were modeled as a blocked freeway. Therefore, vehicles traveling further west of the Oak Hill area were forced to use additional roadways as alternate



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routes. Such additional roadways may include frontage roads, arterials and collectors that are modeled in the network. The overall network study area is expected to be impacted during an incident of complete freeway main lane closure. However, the results of this analysis indicate that the overall network delay (within the study area) for Concept F is significantly higher than the network delays for Concepts A and C. The difference in magnitude of delay for Concept F is about 5 times greater than the delays of Concepts A and C.

***11. William Cannon Interchange Alternate Design Concept: A “mainlanes depressed option” for Alternative F at William Cannon was not evaluated. This option is one the community has been trying to see implemented during this process, not only for Alternative F, but for the rest of the alternatives as it reduces costs and noise, increases access to adjacent properties and does not require the taking of a significant number of existing businesses. Main lane depression is used throughout the other alternatives at the “Y” intersection, but TxDOT has repeatedly said they would not evaluate this option because stormwater pumps would have to be installed and the Central Texas TxDOT region has no pumps installed anywhere in its region. Stormwater pumping is a common alternative in coastal section of the U.S., including other regions of Texas (Houston). This option would result in cost saving when relating Alternative F to the other Alternatives as the existing at-grade geometry of William Cannon could be largely incorporated into the future design. It would also result in significant savings and benefits if used in the other alternatives.***

Currently, both US 290 and William Cannon Drive cross over Williamson Creek (a very large creek known to frequently flood) and these crossings are in very close proximity to each other. Depressing the main lanes of US 290 under an at-existing-grade William Cannon Drive would require extensive excavation and retaining walls adjacent to large oak trees that the community and Oak Hill Parkway team would like to protect. The depressed main lanes would be below the flowline of Williamson Creek, approximately 100 feet to the north. Water-tight barriers would be required to prevent floodwaters from flooding over into the depressed area and stormwater that falls directly into the depressed area would have to be pumped. Due to safety and maintenance issues associated with depressed roadways that depend on pumps, the Texas Department of Transportation will not evaluate a design that must rely on stormwater pumps when there are other viable options. Concepts A and C both provide other options.

All of the concepts explore using depressed roadway sections in other areas of the project length (i.e., outside of the Williamson Creek Floodplain). However, the project team identified methods to drain these depressions without relying on pump stations.

***12. Alternative C is elevated for 1.1 miles between Joe Tanner Lane and the “Y” interchange. Roadway elevation as a physical barrier and aesthetic blight was not evaluated.***

Actually, Williamson Creek and its forested floodplain provide the physical barrier between properties north and south of US 290. Concept C is located along the creek floodplain -in such a way as to minimize channel and floodplain disturbance. Since the project area lies within a 100 year flood zone, Per Federal Highway Administration guidelines, the





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main lanes must be built above the flood zone, thus the elevated structure. Visual impacts and aesthetics will be addressed in more detail for the remaining concepts A and C as they are further developed. Physical barriers and aesthetics are not part of the Purpose and Need so would not be considered in the initial screening process. As the schematics are developed, the project team will conduct a Context Sensitive Solutions process which will address aesthetics.

***13. Noise because of high speed traffic on an elevated roadway for 1.1 miles in the middle of a bedroom community was not considered in the decision process.***

A noise analysis requires more detailed design of the roadway and bridge elements and is not part of the initial evaluation screening process. A noise analysis will be conducted for all alternatives in the Environmental Impact Statement to determine where and how to mitigate any noise caused by expansion of the road. The actual noise workshops often take place after a record of decision has been issued by Federal Highway Administration.

***14. Both Alternative A and C have pavement on the Freescale side of Williamson Creek. Freescale has informed TxDOT that they would oppose any road on their property citing risks to their fabrication unit from vibrations from construction and future traffic. Alternative F has no construction or traffic lanes on Freescale property. This issue was not evaluated in the decision process.***

The project team met with Freescale on June 11, 2013 and again on August 14, 2014 to receive their input. They did express concerns over utility relocations for electricity and water, construction methodologies, locations for shared use-paths and visual impacts of the project. We will continue to meet with Freescale as schematics are developed. However, support or lack of support from one particular business, property owner, or organization is not a part of the Purpose and Need of the project and should not be considered in the evaluation screening.

***15. Austin Community College (ACC) access with the biggest traffic demand west of William Cannon was not included in this decision matrix. Alternative A requires ACC access from the main lanes coming from Austin to exit 1.5 miles east of the college at Joe Tanner Lane. Alternative F serves ACC better than any other alternative, with two access ramps immediately adjacent to the college.***

The project team has worked with Austin Community College to gather their input on the project. At their request, we included a braided ramp (originally called Option 2) into Concepts A, B and C, which provides very good access for ACC. The evaluation criteria were developed to determine which concepts best meet the Purpose and Need of the project. Access to ACC on its own is not part of the evaluation criterion. The project team will continue to work with ACC as schematics are developed.



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**16. Commercial property “taking”:** *The last remaining businesses east of William Cannon and north of 290 were removed with TxDOT/CTRMA’s Alternative F. The subcommittee tried several times to get a better alignment for this area included in the Alternative F concept (including but not limited to item 6 above). These alignments did not require “taking” of these commercial properties and would further lower costs for Alternative F.*

This statement contradicts what the Fix 290 Coalition requested in our July 12, 2013 meeting. Concept F would require displacement of six businesses to accommodate the west bound frontage road at William Cannon Drive. This configuration was developed to address safety issues and avoid having to take large trees adjacent to US 290.

**17. Tolling and Travel Time:** *The relationship between total transportation system congestion and tolling was not considered in the decision process. To be fair, tolling must be considered in travel time evaluations because tolling decreases the number of vehicles on the tolled lanes and increases the number of vehicles on the frontage roads as is evident in CAMPO 2035 modeling which shows 33 percent of total traffic on the frontage roads. This results in a Level “F” LOS on the frontage roads. There is no reason to believe that new modeling would show otherwise. This level of service for the frontage roads was not evaluated in the decision matrix and unfairly represents the other alternatives when compared to an alternative that does not have continuous frontage roads.*

Funding is not considered during the screening for Purpose and Need. The financial feasibility of each alternative will be considered when the Environmental Impact Statement is prepared for the project.

**18. Stormwater detention and water quality treatment were not evaluated in the decision matrix.** *Because Alternative “F” presents a reduced footprint, stormwater detention and stormwater quality treatment will be less costly with Alternative F. Not considering this creates an unfair bias in the current decision matrix.*

Engineering details such as stormwater detention and water quality treatment are not considered during the screening for Purpose and Need. These will be evaluated once schematics for the alternatives are developed. Schematics need to be developed before environmental issues can be researched. Only the concepts that best meet the Purpose and Need of the project will be carried through to schematic design. Preliminary evaluation of the Williamson Creek floodplain indicates that all of the build concepts would require off-site detention.

**19. An unneeded residential road is proposed in Alternative F on the north side of 290, between SH1826 and Scenic Brook.** *One parcel would be required to be purchased at a significantly lower cost than construction for this section of residential road. All other properties have access.*

Cost is not considered during the screening for Purpose and Need. The cost of each alternative will be considered when the Environmental Impact Statement is prepared for the project.



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**20. Tolling Deception: Throughout this process, the single largest number of questions and comments about this project has likely been “Will it be tolled?” The answer has always been that construction financing will not be considered in the concept evaluation and that construction financing will be evaluated and decided upon after the number of concepts have been reduced. TxDOT/CTRMA announced to the community in the Spring of 2014 that the road would be constructed as a toll road, but tolling was not considered in the decision process that concluded June 17, 2014 with the public announcement of the alternatives that will move forward in the design process. The reasoning for this decision was stated as the road was identified as a toll road in the CAMPO 2035 Plan. The CAMPO 2035 Plan has identified this roadway as being tolled since it was adopted in May 2010.**

Project financing is not a criterion when evaluating concepts at this stage of the environmental study.

Transportation funding options were the topic of a public workshop on March 22, 2014 at Oak Hill United Methodist Church. Citizens were invited to visit with representatives from the Texas A&M Transportation Institute (TTI) about options for financing the project, should a build alternative be recommended at the conclusion of the study. Attendees heard about transportation funding options, including tolling; the state of transportation funding; and state and local policies. Attendees were also asked to provide feedback on the Oak Hill Parkway project.

During a presentation given by TTI Researcher Dr. David Ellis, attendees learned that state and federal fuel taxes are the primary funding source for roads and bridges in Texas. He explained that while fuel costs have tripled, the gas tax has remained the same since 1991, so the state has less money available to pay for road and bridge improvements because of inflation. When you factor in the state’s significant population growth and demand on the roadway infrastructure, funding has not kept up with demand, and mobility is likely to get worse. Because of this, he added, innovative financing options are considered viable solutions to funding new projects. Ellis’ full presentation and other materials from the Finance Workshop are available at [www.OakHillParkway.com](http://www.OakHillParkway.com).

Financing needs for roadway improvements of this magnitude are significant. Other than toll financing, federal, state or local governments would likely need to raise taxes to pay for improvements to the Oak Hill Parkway.

Funding alternatives in the Environmental Impact Statement preparation phase of this study will be evaluated because they will affect whether or not the project can move forward.

**21. The Concept of a Free Road Being Sponsored by a Tolling Authority: There is an absolute conflict of interest with a tolling authority sponsoring a non-tolled road.**

The Texas Department of Transportation and the Central Texas Regional Mobility Authority (Mobility Authority) are jointly conducting the Oak Hill Parkway project study. If public funding becomes available and toll financing is not needed, the project can be constructed without tolling the improvements. As part of the 183A toll road project, the Mobility Authority made non-tolled improvements to intersections. The Mobility Authority is also currently working with



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Travis County to build MAHA Loop in southeast Travis County as a non-tolled facility. The Mobility Authority is able to construct non-tolled mobility improvements when local, private and other entities provide funding for the projects.

***22. Traffic Growth Projections: CAMPO 2030 and 2035 Plan traffic projections are extremely overestimated when compared to actual TxDOT traffic counts. Traffic on US 290 between SH71 and William Cannon has increased 7 percent since 2000 (0.6 percent per year), but decreased 2 percent since the peak in 2005 and 2006. The CAMPO 2030 plan shows this segment should be carrying 55 percent more traffic today at a rate that is increasing at 7 percent per year or over 1,000 percent greater than is actually occurring. On US290 between SH71 and SH1826 traffic has increased 2 percent since 1999 (0.2 percent per year). CAMPO 2035 shows this segment should be carrying over a third more traffic than it is actually carrying or an increase of 1,500 percent more than actual. Regionwide, TxDOT VMT is increasing at 1.7 percent while CAMPO 2035 Plan projections are increasing at 3.7 percent or an overestimation of over 100 percent. Alternatives to travel through the "Y": SH1826 traffic has increased 1,000 vpd since 2003. SH71: Traffic has increased 4,000 trips per day on SH71 at the "Y" since 2006 or 2.5 percent per year. Interior residential roads in the area are simply too small and time consuming to carry the kind of capacity that the CAMPO Plans project should have occurred by now. National and local data from other sources show that individual driving behavior has significantly decreased, allowing an increasing population to create total and local trips that are far below CAMPO projections. TxDOT/CTRMA assured the community at the beginning of this Environmental Impact Statement process that additional traffic counts on local roads would be conducted. They have not been done.***

***Appropriate future traffic growth is the single most important aspect of transportation system design. This project is extremely overestimated in scope.***

We are required by the Federal Highway Administration to use the traffic model developed by the Capital Area Metropolitan Planning Organization to conduct environmental studies on federal highways.