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Sisters of the Divine Providence
Smart Growth San Antonio
SEED Coalition
Texas Water Alliance
West Texas Springs Alliance
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

April 26, 2010

To: Loop1604EIS@AlamoRMA.org

Re: Second Scoping Comments on Loop 1604 EIS

The Greater Edwards Aquifer Alliance (“GEAA”) would like to thank you for the opportunity to provide comments on the EIS process to assess improvements to Loop 1604 from Potranco Road to I-35 North.

Under NEPA and recent SAFETEA-LU provisions, it is essential that that the public be involved in the process of developing alternatives. While we would like to be able to meaningfully comment on the proposed alternatives for Loop 1604, the draft alternatives that are presented in the meeting handouts do not contain enough detail to be able to offer very much in the way of substantive comments.

If there is more information besides what is currently on www.morefor1604.com, we would ask that such information be posted online and the comment period extended so that the public may have additional time to review and comment. If what is currently online is all the information that is available on the draft alternatives, we would ask that another scoping meeting be held to present greater detail on the draft alternatives. In order to meet NEPA’s requirements for public involvement, the draft alternatives must incorporate a greater level of detail rather than just presenting a black box of vague road improvements.

All three of the build alternatives are labeled “New Lanes Multi-Modal Upgrades,” with the difference between each alternative merely being the locations of the proposed new highway lanes. There is no indication as to why all the alternatives must involve adding new highway lanes, and there is no indication as to how many new lanes each draft alternative proposes. This is basic information that should be disclosed at this time. Without such information, the public cannot actually evaluate any of the alternatives and it is not even clear why such a project (adding an indeterminate amount of highway lanes) is needed. It is troubling that the Alamo RMA is proposing a highway project without any justification or level of detail.

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It is impossible to tell from the scoping materials what precisely the proposed “multi-modal” upgrades would entail. We would again urge Alamo RMA to consider *and specify* alternatives that utilize a package of improvements based on TDM/TSM strategies. FHWA guidance lists six categories of demand-management alternatives, including travel alternatives (alternate hours of travel, work schedules, telecommuting, etc.), land use alternatives (smart growth policies, pedestrian/bicycle connections, transit-oriented design), pricing alternatives (HOV lanes, parking pricing), HOV alternatives (rideshare matching, vanpools, priority HOV parking, etc.), transit alternatives (subsidized fares, trip itinerary planning), and freight alternatives (lane restrictions, delivery restrictions).

Public transit is a primary means of decreasing peak travel demand and we strongly recommend incorporation of alternatives based on substantial new public transit service in combination with other improvements. Ridesharing and park-n-ride programs also reduce the number of cars during the peak periods and should be considered. Because of VIA’s central role in such improvements, we would again urge VIA’s designation a “cooperating agency” so that the proposal and refinement of alternatives will benefit from public transit expertise.

Due to the sensitivity of the project’s location on the Edwards Aquifer, and the need to reduce greenhouse gas emissions, it is imperative that all alternatives prioritize TDM/TSM improvements. The consideration of alternatives should, moreover, prioritize TDM/TSM measures that do not involve new highway lanes. Rather than starting with the assumption that the highway should be expanded, whether through managed lanes or not, combinations of non-capacity adding TDM/TSM measures should first be analyzed. After judging how well such demand and system management measures meet future traffic needs, Alamo RMA will have a better sense of how much new highway capacity is needed. If Alamo RMA must consider new capacity at that point, priority should be placed on HOV lanes before considering other types of highway lanes. This approach will not only lead to a smaller footprint (and perhaps no increase in the road footprint) that is better for the environment—it will prioritize the most cost-effective solutions that do not involve major highway construction.

We also again urge that VIA and the Edwards Aquifer Authority be invited as cooperating agencies in light of their respective expertise on mass transit and the hydrogeology of the area. The regulations do not state that cooperating agencies must be federal. While we are pleased that VIA and EAA are involved as participating agencies, the need for mass transit and an environmentally-sensitive transportation project for Loop 1604 is overwhelming and compels the greater involvement of these local authorities.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Annalisa Peace". The signature is fluid and cursive, with a long horizontal stroke at the end.

Annalisa Peace, Executive Director
Greater Edwards Aquifer Alliance