Greater Edwards Aquifer Alliance

Member Organizations

Alamo, Austin, and Lone Star chapters of the Sierra Club
Act Now Comal
ARK Ecological Consulting
Beltorre & Surrounding Neighbors
Bexar Audubon Society
Bexar and Travis-Austin Green Parties
Bexar Grotto
Bulverde Neighborhood Alliance
Bulverde Neighborhoods for Clean Water
Cibolo Center for Conservation
Citizens for Protection of Cibolo Creek
Coalition for Responsible Aggregate Mining (CREAM)
Comal Conservation
Comfort Neighbors
Congregation of the Divine Providence
Conservation Society of San Antonio
Dry Comal Creek Neighbors
Environment Texas
First Universalist Unitarian Church of SA
Fischer Neighbors
Fitzhugh Neighbors
Friends of Canyon Lake
Friends of Castroville Regional Park
Friends of Government Canyon
Fuerza Unida
Green Society of UTSA
Hays Residents for Land & Water Protection
Headwaters at Incarnate Word
Helotes Heritage Association
Hill Country Alliance
Kendall County Well Owners Association
Kerr County Water Alliance
Las Moras Springs Conservation Assoc.
Llano River Watershed Alliance
Native Plant Society of Texas – SA & NB
Northwest Interstate Coalition of Neighborhoods
Pedernales River Alliance – Gillespie Co.
Preserve Castroville
Preserve Lake Dunlop Association
Preserve Our Hill Country Environment
RiverAid San Antonio
San Marcos Greenbelt Alliance
San Marcos River Foundation
Save Our Springs Alliance
Save Salado Creek
Save Texas Streams
Scenic Loop/Helotes Creek Alliance
SEED Coalition
Signal Hill Area Alliance
Texas Cave Management Association
Trinity Edwards Spring Protection Assn.
Water Aid – Texas State University Watershed Association
Wildlife Rescue & Rehabilitation

Greater Edwards Aquifer Alliance
PO Box 15618 San Antonio, TX. 78212

May 1, 2026

Central Texas Regional Mobility Authority (CTRMA)
3300 N Interstate 35 Frontage Rd
Austin, TX 78705

Re: Comments Regarding Mopac South Environmental Study

Please accept the attached comments on behalf of the fifty-eight member groups of the Greater Edwards Aquifer Alliance (GEAA).

1.0 Background. The Texas Department of Transportation (TxDOT) and the Central Texas Regional Mobility Authority (CTRMA) propose improving transit reliability and reducing traffic congestion for an 8.77-mile segment of State Highway (SH) Loop 1 from Cesar Chavez Street to Slaughter Lane in Travis County, Texas (the "Project"). An Environmental Assessment (EA) has been prepared in accordance with the procedural provision of the National Environmental Policy Act (NEPA) and other required federal and state provisions.

The purpose of this EA is to study the potential for significant environmental impacts of the proposed Project and to determine whether such impacts warrant the preparation of an Environmental Impact Statement (EIS); or if not, TxDOT will prepare and sign a Finding of No Significant Impact (FONSI), which would be made available to the public. This EA has been made available for public review and comment.

2.0 Greater Edwards Aquifer Alliance (GEAA). GEAA submits the following comments on behalf of its fifty-eight member organizations. GEAA is a 501(c)(3) nonprofit organization that promotes effective, broad-based advocacy for the protection and preservation of the Edwards and Trinity Aquifers, their springs, watersheds, and the Texas Hill Country that sustains them. GEAA has multiple members who would be adversely affected by the proposed Project by TxDOT and CTRMA.

GEAA's members have serious concerns regarding the proposed Project, relating to the degradation of Barton Creek, Williamson Creek, Slaughter Creek, and their many tributaries that recharge the Edwards Aquifer in the Project area. The recharging creeks and tributaries would likely be negatively impacted during both the construction and implementation

phase of the Project, as the entire 8.77 miles of proposed road construction sits within the Edwards Aquifer Recharge Zone (EARZ). Accordingly, we also have serious concerns regarding negative impacts to the Edwards Aquifer itself.

3.0 Specific Concerns Regarding the Proposed Project: GEAA has multiple areas of concern regarding this ill-advised Project, relating to the primary justification(s) for the Project, the negative impacts on surface water quality of recharge streams in the Project area, negative impacts on Edwards Aquifer water quality, and negative impacts to flora and fauna in the Project area.

3.1 Concerns Regarding the Primary Justification for the Project. The EA doesn't provide adequate detail as to where the traffic measurement assumptions and numbers came from, but it appears that all measurements and assumptions are based on traffic data taken in 2018/2019 or earlier, prior to the COVID epidemic. COVID completely upended traffic patterns worldwide, nationwide, and in Austin, as more employees worked from home and took advantage of telecommuting technologies including videoconferencing. Even as COVID impacts waned after 2022, many employers adopted hybrid work models consisting of remote telework on certain weekdays and times, combined with in-office work. These changes were profound in nature and substantially impacted traffic flows and peak traffic times across all major U.S. cities.

Basing any set of assumptions or recommendations off pre-COVID traffic data, as the EA does, results in erroneous conclusions. It would certainly be disastrous to undertake such an extensive construction project as building multiple additional lanes, overpasses, flyovers, ramps, and other roadway modifications, all based on pre-COVID data.

Aside from the questionable nature of the underlying traffic data used on the EA, the conclusions reached in terms of improvement in transit times hardly justify such a massive, expensive, and environmentally-harmful project. Prior to undertaking such enormous construction of toll lanes, one would ask "What percent of Mopac drivers are currently using the Mopac express lanes that currently exist north of the proposed Project area?". Finding the answer to this important question should be relatively straightforward, yet there is no answer on the CTRMA website. Instead, one must sort through the various cherry-picked data that CTRMA provides and perform additional calculations, using these figures:[1]

- Recent studies show that the MoPac South corridor attracts approximately 174,000 vehicles per day
- The existing MoPac Express Lanes carry up to 1,600 vehicles per hour (maximum)

Assuming that the 174,000 vehicles per day extends to South Austin and has two peaks, during morning and evening rush hour, and each of those peak hours contain 10% of the Average Daily Total (ADT) of traffic[2], we can conclude that the maximum number of cars driving on Mopac during peak hours is 17,400. Of this total, 1,600 vehicles per hour travel in tolled lanes (express lanes) while 15,800 vehicles per hour travel in non-tolled lanes. In other words, current toll traffic during

rush hour on Mopac consists of just 9.2% of total traffic. It is unlikely that future traffic on new Mopac toll lanes would vary significantly from this 9.2% figure.

This is the fundamental problem with trying to solve traffic problems by building toll lanes; in the case of Mopac, less than 10% of the population are likely to use them on a regular basis. Examining the Exhibit 1 provided in the EA below (Fig. 1), the issue seems readily apparent.

Fig. 1: The EA shows an improvement of just 4 minutes northbound and 5 minutes southbound in the non-toll lanes by 2045, if the South Mopac toll lanes are built under the proposed plan 2C.

A time savings of 4 or 5 minutes for a typical commute would be beneficial, but not necessarily at a cost of $825M.[3] And this 4-5 minute time savings is for drivers going the entire 8.77 mile length for their commute. The time savings would be half that amount for a driver entering or exiting Mopac at Ben White Boulevard, for example.

It should also be noted that this $825M figure is the CURRENT CTRMA estimate. By the time the project would receive final approval and begin construction several years from now, it could easily exceed $1B in total cost to completion.

One would ask how this $1B project cost would be funded, or repaid? We can look at the 11 mile existing Mopac express lanes between Cesar Chavez St. and Parmer Lane in North Austin for answers. Over a 21-month period in 2018 and 2019, the existing Mopac express lanes generated $28M in revenue, or $16M per year[4]. Even assuming that the current $825M cost estimate is

accurate, and even assuming zero cost for annual road maintenance and toll management, it would still take over 50 years to pay off the South Mopac Expressway toll lanes.

3.2 Concerns Regarding Negative Impacts on Surface Water Quality of Recharge Streams in the Project Area. Fig. 2 shows all of the major creeks and their tributaries that the new construction would have to cross – 10 streams total, all of them recharge streams for the Edwards Aquifer. Many of these waterways are dry most of the year, since they contain numerous faults, fractures, seeps, and springs which allow surface water to flow to groundwater in the EARZ. While modern highway construction incorporates Best Management Practices (BMPs) for the control of pollutants and sediment, it will be challenging if not impossible to prevent substantial pollution of these recharge streams during the South Mopac Expressway construction.

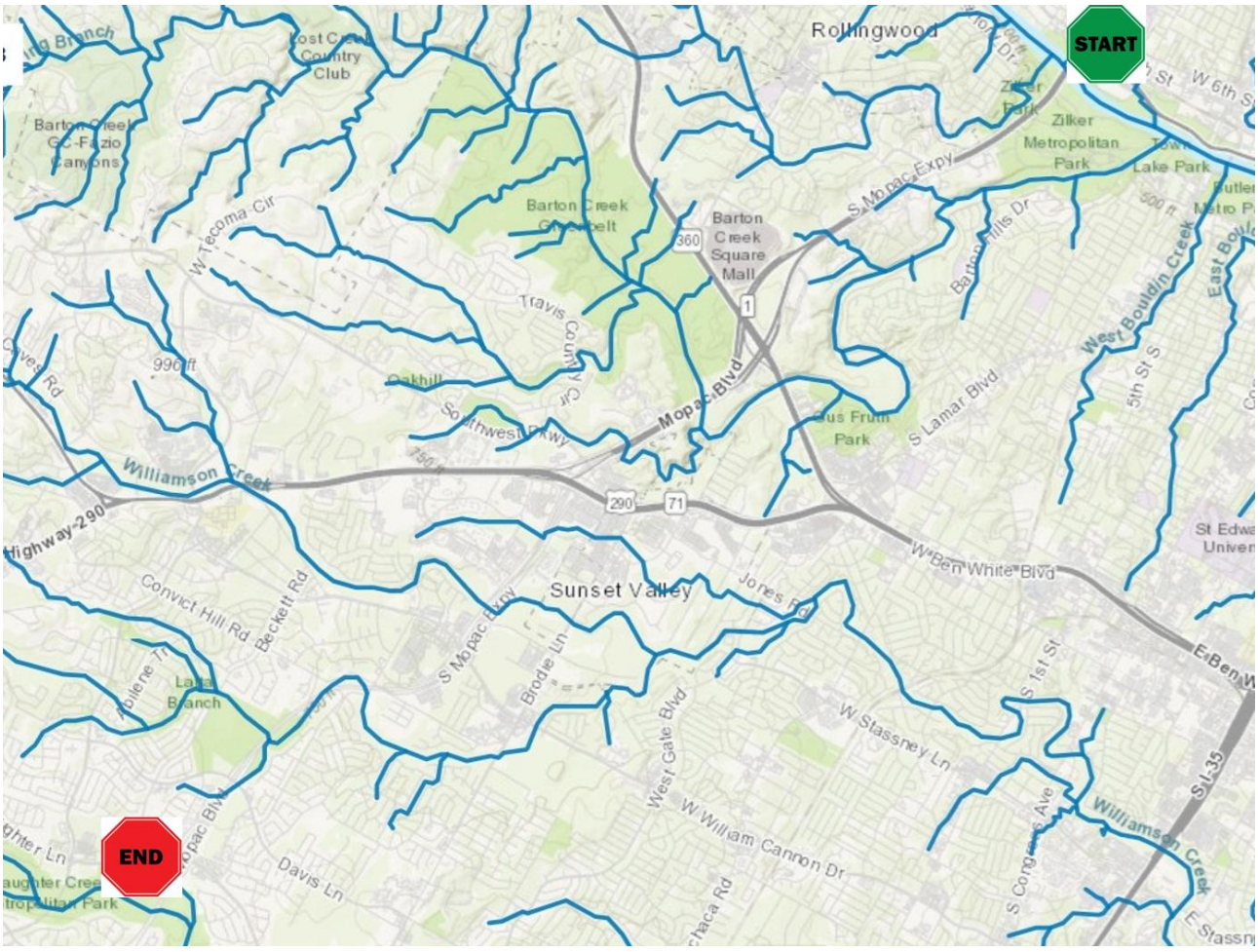


Fig. 2: The 8.77 mile Project construction would cross numerous important creeks and tributaries that recharge the Edwards Aquifer and Barton Springs. (image source: TPWD)

Because the entire Project construction would take place over the EARZ, groundwater quality would be put at risk. Perhaps most importantly, the groundwater that flows into Barton Springs would be subject to whatever construction debris, sediment, motor oil, diesel fuel, and other pollutants are generated from Project construction vehicles. These pollutants would flow into waterways such as Williamson Creek, drop down into the Edwards Aquifer, and then flow directly into Barton Springs, the crown jewel of Austin and Central Texas. Is it really worth polluting this precious resource just to save a few minutes of commute time many years from now?

Fig. 3 below shows the underground flow path of the Edwards Aquifer in this area. Multiple dye traces were run from various South Austin locations within the EARZ[5]. While some of the dye locations exhibited flow to Cold Spring (shown as the blue circle at the top of Fig. 3), many other dye locations exhibited flow to Barton Springs. Importantly, dye tracer locations D, C, and E are either adjacent to Mopac or very close to it. This shows that any pollutants generated by the Project construction that are not contained by BMPs would quickly foul Barton Creek in a matter of days.

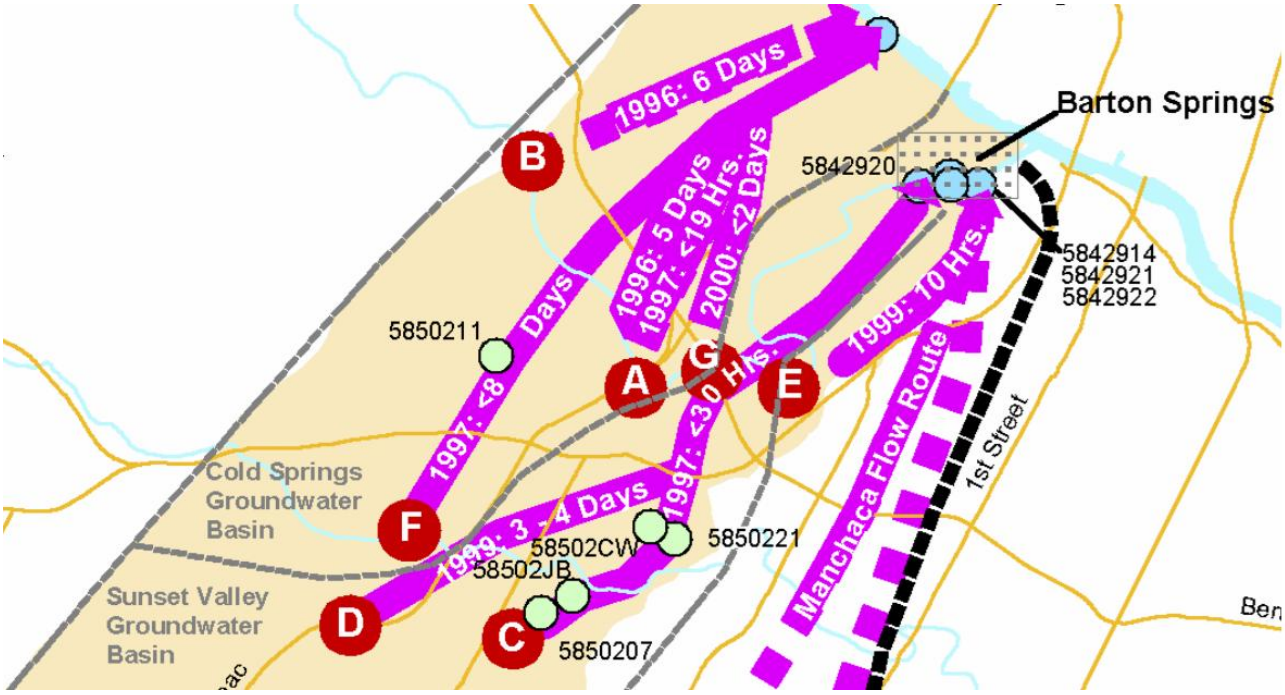


Fig. 3: Dye that was dropped into one Karst area (D) along Mopac reached Barton Springs in 3-4 days

3.3 Concerns Regarding Negative Impacts to Flora and Fauna in the Proposed Project Area

The Project EA attempts to minimize the importance of actual disruptive impacts that the construction would have. But the EA clearly states “Approximately 8.51 acres of temporary

construction easements would be required for construction." What this means is 8.51 acres of trees would be cut down and discarded, 8.51 acres of animal habitat would be obliterated, and 8.51 acres of valuable vegetation would be eliminated. While a tree survey would be conducted, and trees of 19" diameter or larger would be evaluated as to how they could best be protected, construction projects of this extensive nature invariably remove substantial amounts of wooded areas.

One need only look at the nearby Oak Hill Parkway, another TxDOT road project that was supposed to protect the environment but has removed many legacy oak trees and turned the entire area into something that looks like a future apocalypse landscape (see Fig. 4).

The Project EA often refers back to TCEQ's Edwards Aquifer Protection Program (EAPP) as a catch all for supposedly protecting the environment during the construction phase. But GEAA has seen firsthand the inadequacy and outdated nature of TCEQ's EAPP program. EAPP plans have been approved by TCEQ which allow for excessive impervious cover, creating stormwater runoff issues that are not fully addressed by the placement of a few batch detention ponds near runoff areas. Sensitive features like caves, sinkholes, and streams are not sufficiently protected from construction damage. And batch detention ponds aren't properly maintained, overflowing with trash and debris that eventually finds its way into nearby waterways.

Fig. 4: TxDOT's Oak Hill Parkway project has destroyed area flora, decimated animal habitat, and disrupted driver commutes for several years now. (image source: TxDOT)

The EA states “Optional Enhanced Water Quality Measures Appendix B (TCEQ 2007) is not relevant, as it only applies to known features occupied by karst invertebrate within the Project ROW or easements.” But the Edwards Aquifer is home to several federally-recognized endangered species, including the Barton Springs Salamander[6] and the Austin Blind Salamander[7]. These latter two species make their home in the depths of the Edwards Aquifer. Any surface water pollution resulting from the Project construction would likely flow into the Edwards Aquifer and threaten or potentially eliminate these environmentally-sensitive species.

But it isn’t just area flora and fauna that would be affected by the proposed South Mopac Expressway. The beloved Violet Crown Trail, used by thousands of Austin hikers and bikers, runs adjacent to Mopac from Whirlpool Cave south and then criss-crosses Mopac several times, all the way to the trail end at Lady Bird Johnson Wildflower Center four miles away. This trail would likely have to be shuttered during the lengthy construction phase of the Project; yet another inconvenience caused to Austin residents in order to build an unnecessary toll road that won’t significantly improve the lives or commute times of most Austinites.

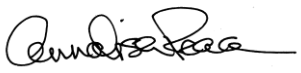
4.0 Conclusions and Recommendations. It is unfathomable that CTRMA and TxDOT are ready to move forward with a massive roadway construction project likely costing close to $1B, basing their entire justification on traffic data taken in 2018/2019, prior to the COVID pandemic. It is highly recommended that new traffic data be collected in order to obtain a proper baseline for the Project.

Because the Project EA is so vaguely-worded and seems to reach a “pro-build” conclusion early on while then cherry picking data and using generalized statements to support those predetermined conclusions, it is highly recommended that an actual Environmental Impact Assessment (EIA) be performed, with the results of that EIA shared with the public.

It is our sincere hope that CTRMA and TxDOT take the time to properly analyze the impacts of such a monumental road project, continue collecting public input, and only then consider the options available in order to meet Austin’s future traffic demands.

Thank you for the opportunity to submit these comments.

Respectfully,



Annalisa Peace
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1 https://www.mobilityauthority.com/wp-content/uploads/2023/11/Toll_Pay_MopacEL_09_09_19.pdf

2 https://www.precisiontrafficsafety.com/solutions/traffic-studies/#:~:text=The%20peak%20hour%20volume%20(highest,10%20percent%20of%20the%20ADT.

3 https://www.kvue.com/article/traffic/mopac-south-project-environmental-study-austin/269-1e153248-1418-4bc4-8ed1-7272d211d24a

4 https://cbsaustin.com/news/project-gridlock/where-28m-in-mopac-express-tolls-are-going

5 https://bseacd.org/uploads/Hauwert-et-al_-2004-Edwards-Symposium.pdf

6 https://tpwd.texas.gov/huntwild/wild/species/bartonspringssalamander/

7 https://en.wikipedia.org/wiki/Austin_blind_salamander