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TO: Austin Transit Partnership (ATP) and Federal Administration (FTA)  
FROM: South River City Citizens Neighborhood Association (SRCC)  
DATE: March 1, 2025  
RE : Austin Light Rail Phase 1 Project National Environmental Policy Act (NEPA)  
Draft Environmental Impact Statement January 2025

Please accept this feedback regarding support for the ES.2.1 No Build Alternative in the Austin Light Rail Phase I Draft Environmental Impact Statement (EIS) referenced above. This position was voted on at the February 18, 2025, General Membership meeting of the South River City Citizens Neighborhood Association (SRCC), following the presentation from Austin Transit Partnership.

SRCC <<https://www.srccatx.org>> is a fifty-year-old neighborhood group of stakeholders living between Lady Bird Lake and SH71 and from South Congress Avenue east of I35 to Parker Lane. Our feedback concerns the ES.2.2.3 South Section which is entirely within SRCC boundaries.

The summary below was compiled from residents on or adjacent to East Riverside Drive; SRCC representatives to the South Congress Parking Transportation Management District; Sherwood Oaks residents south of Oltorf and east of Congress; the Blunn Creek Partnership; and general community comments based upon the January 2025, National Appendix C, Part 1, South Segment, Base Design and Plan Profile, Sheets No. 1-9 and Part 2, Design Option, Lady Bird Lake Bridge Extension Plan and Profile, Sheets No. 1-11.

### **Riverside Drive**

Elevated tracks on East Riverside and over East Bouldin Creek will present visual nuisance, noise, vibration, and other adverse conditions for the Travis Heights-

Fairview Park National Register Historic District. <https://historictavisheights.org/our-effort/>.

Proposed Travis Heights Station would constitute an alienation of parkland, taking of Norwood Park.

<https://thenorwoodhouse.org/>

<https://www.austintexas.gov/department/norwood-house-rehabilitation>

Effects of construction will affect integrity of **East Bouldin Creek and Blunn Creek**. <https://blunncreekpartnership.org/>

Shared use path as shown presents danger to pedestrians and cyclists.

It is unclear how ATP will compensate for elimination of **Travis Heights** Station, shown in all previous design diagrams until release of Draft EIS.

**Alameda Drive** safety risks are not resolved.

### **Sherwood Oaks**

Access in and out of neighborhood will be disturbed by the plan. No alternatives are shown.

### **South Congress** (Base Resolution)

Removal of all street parking will prevent South Congress Parking Management District from collecting funds necessary for safety improvements.

<https://www.austintexas.gov/SouthCongressParking>

Project Plan seems to coordinate with and subsidize potential new development in South Central Waterfront but not with existing businesses, properties, and Conditions.

Pedestrian and bicycle safety are compromised by expanding transit right of Way.

Access in and out of neighborhood is not resolved.

Visual and noise nuisances are not resolved.

Station locations are unsuitable for access to schools, businesses, and neighbors.

### **General**

Draft EIS was placed at Twin Oaks Library in white binders with only general covers and no binder labels indicating sections.

Since release of document, SRCC requested a digital file of the entire South

Segment so that affected neighbors who may not be skilled in reading plans and coordinating match lines could participate in review and comment. This was not made available.

Light rail cannot resolve transportation issues when there are not sidewalks to take future riders safely to South Congress or Riverside Drive from neighborhood Streets.

A circulator that loops from Ben White to the UT Campus through downtown is not explored.

Bus Rapid Transit buildout is not explored.

Access to and from airport is unclear.

Attached below are the base resolution and amendments used to compile the summary above.

## BASE RESOLUTION

*SRCC reviewed and discussed in committee the light rail project plans for the intersection of South Congress Avenue and Riverside Drive (“Plans”), which Austin Transit Partnership (“ATP”) presented in their Project Connect Draft Environmental Impact Statement. SRCC voted by resolution to oppose the Plans because their implementation would negatively impact our local culture, pedestrian and bicyclist safety, and locally funded sidewalk construction projects.*

*To implement the Plans, the City would need to remove parking on South Congress Avenue and narrow the pedestrian and bicycle lanes. This would result in (i) a dearth of parking options for visitors, locals, and businesses, and (ii) compromised safety of pedestrians and bicyclists. Some of the secondary impacts would include (i) gridlocked traffic, (ii) lower revenues for businesses, (iii) overcrowding and traffic spillover in the charming local neighborhoods, (iv) more car accidents and serious injuries to pedestrians, bicyclists, and commuters, and (v) less parking for locals.*

*On February 18, 2025, SRCC resolved that the City should prevent ATP from using Austin’s voter-approved tax for Project Connect to destroy the world famous and eclectic nature of South Congress Avenue. Accordingly, SRCC requests that the City seek and implement alternative mobility plans for South Congress Avenue that comport with the goals of Project Connect, including safer mobility options that enhance the historic corridors of our City.*

## RIVERSIDE DRIVE

1. An elevated rail line via a new tall bridge would completely change the character and culture of one of the oldest and historically significant parts of the City, commercializing it and greatly diminishing its appeal to residents who live there, particularly those who live on or near Riverside or have a view corridor facing it (all **unnecessarily** since a ground option is available).
2. A street level rail does not intrude in the same manner, as it merely adds another type of vehicle to the mix.
3. According to ATP's rep at the public meetings, ATP is preferring the bridge because it's "easier"; this should not be the criteria; Stassney Lane would have been easier too and was the location for the rail pitched by the City before the rail vote several years ago.
4. A high bridge violates the privacy of many homeowners in Travis Heights because it provides a birds eye view into homeowners' yards and windows. Noise and vibration from the rail is also inevitable and adversely affects use and enjoyment of residents' homes.
5. Businesses along Riverside are also disadvantaged because of lessened visibility of their buildings and signage due to the bridge.
6. The bridge would create a darkened tunnel effect on the ground level below it and decrease light into the neighborhood due to its massiveness. Additionally, noise from car traffic on Riverside would increase and reverberate into the neighborhood further because it would be capped by the bridge instead of dispersed upward.
7. At the public meetings, ATP provided incomplete and misleading information about the Travis Heights portion of the rail project, as no elevations were mentioned or shown on the information boards used at the meetings; the depiction of Riverside was just the route and appeared to be at street level, so objections to the high bridge would not have been elicited. The explanation given by ATP's rep for the fact no elevations were provided was that there wasn't room to include all information and that it was all available on line; but obviously, if a concern wasn't raised by what WAS shown, a deeper look online would not occur and the City would not be eliciting accurate and meaningful public input.
8. The form distributed at the public meetings for comment had one vague question regarding the proposed bridge, to be answered yes or no: "Extending Bridge and Elevating Waterfront Station - do you agree with the recommendation?" Most

people would think the bridge reference is to the bridge over Lady Bird Lake and likely not object to it or the station near it, causing responses on the form to most likely not provide an accurate response about the Riverside bridge; ATPs rep pointed to that question and told me to put my Riverside answer/comments there; additionally, the mere naming of the Riverside bridge the “Lady Bird Lake Extension Bridge” in the DEIS is misleading because it is separate and apart from the lake bridge, with the lake bridge connection point to Riverside not even decided at this date.

9. Constructing a new bridge would be more disruptive, costlier and time consuming than modifying the street as initially planned. It is also contrary to the stated aim of Project Connect to reduce the impact of transportation on air, land, and water, because it adds a huge new concrete and steel infrastructure when an existing street level option is available.
10. Ironically, Travis Heights residents will be the most adversely impacted by the new infrastructure (both construction and operation) but will not be serviced by it because ATP has determined that Travis Heights is not a demographic in need of transit support. The initially proposed Alameda station has been deleted from the plans, perhaps to aid in the ability to propose a new high bridge that does not need to reach existing ground elevation until further east. But the fact that it was initially included confirms that a rail line at ground level is doable (Riverside was to be elevated between Blunn Creek and Alameda about 8 feet to accomplish this “due to the curvature in the street” but was to be the only elevation) and is still available as an option, although not the option preferred by ATP.
11. According to a Travis Heights resident who has spent 30 years as a TXDOT bridge designer, the bridge would create an eyesore nearly as massive as the elevated upper deck of I-35.
12. Last but not least, the installation of a high bridge down Riverside through Travis Heights would cause a devastating decrease in property values of homes on, near or in the line of sight of the bridge, and would likely have a similar effect on business properties adjacent to the bridge.

## BLUNN CREEK PARTNERSHIP

I provide the following comments about the Austin Light Rail EIS on behalf of the Blunn Creek Partnership, a volunteer-run, non-profit organization that has worked for 20 years on managing, protecting and improving public lands in the Blunn Creek basin, a watershed that would be critically affected by the Austin Light Rail proposal.

I initially question the basic premise for the Plan: that the project will give access to major job centers, education hubs and iconic Austin destinations. I do not think that rigid railways and networks can adequately service these centers, hubs and destinations: they shift too rapidly, declining and rising too quickly. Please remember that Austin's downtown is now suffering from 30% vacancy rates, that many UT students no longer live in the Riverside area but instead reside in the Guadalupe district, and that many workers now choose not to physically go to work or school, but instead connect remotely, digitally.

Considering Figure 1-1, I am very surprised to see that the rail line does not extend to the airport. The airport is clearly the place with the highest priority for the railway to serve, since it would connect there with people who are typically arriving without a vehicle, who are not familiar with navigating the city, and so would be open for mass transit.

In Part 1.2, there is mention that the Project is needed to support growth of and connectivity to the regional activity centers. The connection between the Project and urban growth and development unavoidably introduces the risk for subsidizing certain areas over others, and brings in the chance of corruption tainting the Project, where some areas and developers are supported, while others are not.

In Table 1-2, Projects and Goals, sustainability is stated as a goal of the Project, aiming to reduce transportation impacts on air, water, land, etc. However, the Project envisions an enormous construction project, involving use and deployment of concrete, steel, and other materials, an entire new overlay of infrastructure on top of Austin's existing streets and roads.

Chapter 6 considers Environmental Justice, a laudable goal, but undermined by the planned siting of train service and repairs yards in a traditional under-served, minority part of town.

In Appendix A, Section 3, the report describes the alternatives that were dismissed from further consideration. It is unfortunate at least one very viable option was not examined – use of on-demand micro transit, a system of smaller, self-driving EV vans, perhaps carrying 10 passengers, tied in with rapid buses on high-density, high-demand corridor. This fleet would draw on the existing dynamic, on-demand route choice that Amazon, UPS, and Fedex, and build on the speed and convenience that travelers have come to expect from Uber and Lyft. This system would not require the multi-billion dollar buildout of fixed rails, which would take many years to erect and might rapidly become obsolete. This system would allow door-to-door, on-call pickup and delivery without the time and expense of a rigidly-scheduled light rail system.

In Appendix A, Section 3, the report tracks the planning history of the project, and details the series of cost overruns and delays. This past may well be prologue. The City needs a mass transit solution that can be deployed quickly to accommodate our rapidly growing population and more and more severe traffic jams and slow-downs. Also, at a time where the federal government is

facing massive deficits and a legacy of debt, we need to be frank about the unlikelihood of getting adequate Light Rail funding to match the City's investment, which is itself burdened by high debt, ad valorem taxes and regressive sales tax rates. The micro-transit option would be a speedy and cost-effective alternative – using existing streets and roads, and off-the-shelf vehicles, calling and routing technology. Further, the micro-transit system would save the value of users' time spent walking to and waiting for pickup, waiting for transfers, and walking to the ultimate destination. Finally, the sponsors of the Project need to think seriously about the condemnation costs, for both litigation and land, to acquire the space for a Light Rail system.

Appendix A touches on questions of ridership in many areas. However, it is not clear that the Light Rail project would attract the level of ridership that would take a meaningful number of vehicles off the road, and that would underwrite the cost of the transit system. Already, it appears that Uber and Lyft and private vehicle travel far exceeds the use of the City's bus system. While Light Rail is an idealistic ambition, it seems that Austinites have already voted against using mass transit that relies on fixed routes and schedules, and it does not appear that the Light Rail EIS demonstrates that that would change.

In conclusion, I think that the Light Rail Project was conceived before the technology was widely recognized for an on-demand, hybrid, flexible micro-transit system. Unfortunately, early bets were laid on an outmoded idea of dedicated rail service that might have made sense a generation ago, but no longer does. The sponsors for rail are proposing a Project that is already now obsolete, and will be even more rigid, costly and antiquated by the time it is put into operation.



## ALAMEDA DRIVE

-Design Riverside for vehicle traffic of no more than 25 mph.

-Increase the buffer between general vehicle lanes and the SUP on the south side of the street to 6 feet along Riverside, with space for landscaping, trees, and protective bollards. Adopt elements of the greenway concept from East Riverside to add landscaping or even a pocket park at the end of Alameda and Academy near Blunn Creek.

-Adopt a two way SUP on the south side of the street and remove the conflict between speeding cars coming down the hill from Travis Heights Blvd. A narrow trail or sidewalk may be workable on the north side of the street, as long as it is behind the protective trees from Alta Vista to the Hike and Bike Trail entrance.

-Add vertical separation between the SUP and general use lanes by lowering the general vehicle lanes and/or raising the SUP.

-Make Alameda Dr a one way turn from Alameda onto Riverside— do not permit vehicles to turn from Riverside onto Alameda. Add a bulb out at Riverside and Alameda.

-Add limited on-street parallel parking to Riverside in front of the Norwood Tract between Edgecliff Terrace and Travis Heights Blvd. On street parking has been shown to slow down vehicle speeds on streets, and this would allow for some impervious cover used for parking at Norwood along Edgecliff Terrace to be returned to green space.

-Reduce general vehicle lane width on Riverside to 9'.

## SHERWOOD OAKS

Additional comments to the 'SRCC Proposed Comments in response to DEIS,' pertaining to the location of the southernmost Oltorf station and Park and Ride: <https://austinlightrail.org/austinlightrailinput#tab-60343> (Design Detail Map 1) proposed for Long Bow Lane and South Congress Avenue, SRCC Area 5:

Upon discussion regarding Sherwood Oaks neighborhood, SRCC Area 5, we reject the location of the southernmost station (Oltorf Station) and planned Park and Ride in consideration of the following potential impacts:

### 1. Traffic Flow:

#### i. Long Bow Lane and South Congress Avenue:

- a. Closing and limiting a major traffic vein into residential and county service area by way of omitting left turn access into Sherwood Oaks neighborhood from southbound lane on South Congress Avenue
  - i. Affecting:
    1. Residents of Sherwood Oaks
    2. Employees and safety operations of Travis County Juvenile Justice Center
    3. Any vehicle operator using proposed Park and Ride lot
    4. Safety police operations and emergency vehicles traveling southbound on Congress trying to access / service affected area
- b. Omitted egress from Long Bow Lane for drivers, operations, emergency vehicles with intended southbound route on Congress
  - i. Implications:
    1. Extremely limited access for safety and police vehicles from neighborhood.
    2. Unnecessary dangers and inconveniences for those who live in Sherwood Oaks and those leaving the proposed Park and Ride.
    3. The only way to access a southbound Congress route would be to exit the north side of Sherwood Oaks onto Oltorf from either Sherwood Lane or East Side Drive. Be it noted that:
      - a. This stretch of Oltorf is rife with drivers going downhill, and well above the speed limit, from blind hill peaks on either side. Please note [this recent fatality](#) on this very stretch of road.

- b. It is common to observe drivers running the red light at East Side Drive on Oltorf.
  - c. This would cause both up-regulated safety concerns, as well as congestion in the neighborhood from the traffic attempting to turn left onto Oltorf from these streets.
  - d. Proposed Park and Ride lot access for vehicles approaching station from the north is to cut-through retail parking lots from Oltorf or to utilize Sherwood Oaks neighborhood as a cut-through to access.
  - e. St. Edwards University will no doubt suffer from increased traffic as people seek to cut through the campus in order to turn left to go south on Congress. This will happen from both residents of Sherwood Oaks and the Park and Ride population.
  - f. Many traveling on I-35 wishing to access the proposed Park and Ride lot will undoubtedly choose to cut through Sherwood Oaks using St. Edwards Drive rather than choosing a more populated, and considerably more dangerous, Oltorf Street.
- c. Severe increase in auto traffic at intersection of Congress and Oltorf due to station placement and:
- i. Exit of all vehicles forced to use the north side of Sherwood Oaks as exit point.
  - ii. Traffic approaching or leaving the HEB.
  - iii. Population that will inhabit, and work, at the proposed redevelopment of the currently largely defunct Twin Oaks Shopping Center.
  - iv. All normal or enhanced vehicular traffic exiting from I-35 utilizing Oltorf as an access vein for westbound travel.

Final notation: (1. Traffic Flow):

There has been no proposed safe or convenient outlet for southbound Congress drivers or safety vehicle operators leaving Sherwood Oaks or the proposed Park and Ride lot. Without any such addition for relief it is obvious that this will cause undue, rampant congestion in both Sherwood Oaks as well as the adjacent retail lot that is supposedly only to be utilized by the businesses at the corner of Congress/Oltorf. This is gross oversight considering that, this being the southernmost terminal in the proposed first phase, people will certainly be

coming from the south, and wish to return from where they came, going back south on Congress.

2. Vehicular:

- ii. Vastly increased and overwhelming vehicle density to Sherwood Oaks neighborhood:
  - a. ATP plan to lease 100 parking spaces for a Park and Ride on [county land](#), located at the northeast corner of the intersection of Long Bow Lane and South Congress Avenue, the entrance to Sherwood Oaks neighborhood, and current location of the Bank of America and county buildings:
    - i. These parking spaces and available public parking area on Long Bow Lane are already filled to capacity on any given day, typically numbering around 80 vehicles. Therefore:
      - 1. There is a large discrepancy of available leased parking space due to:
        - a. Active utilization of current spots.
        - b. Vastly higher projected boardings than proposed rentable spaces. Therefore:
      - 2. We have great concern regarding the effects of parking overflow into the neighborhood upon the filling or unavailability of the projected rented Park and Ride parking spots.
  - b. Vehicle operators coming from all points south (or any other potential direction) to station their cars within the neighborhood and ride the train, at all hours of train operation, resulting in:
    - i. Increased noise.
    - ii. Increased foot traffic.
    - iii. Increased trash.
    - iv. Reduction of privacy to a heritage neighborhood.
    - v. Decreased safety for cyclists, pedestrians, and children in the neighborhood.
    - vi. Decreased safety of property due to privacy reduction and increased density.
    - vii. Inability for residents to utilize street parking and have safe, reliable access to their own homes.
  - c. External vehicle operators (ride share, self-driving vehicles) utilizing the neighborhood as a hub to idle while they await intended fares or cut through the neighborhood on their intended routes.
  - d. Increased traffic flow from vehicle operators using the neighborhood as a cut-through from I-35 to access the Park and Ride / passenger drop off.

- e. Disruption to quality of life and property values as a result of a changed neighborhood environment.

3. Unhoused Population:

- iii. Probable increase to unhoused population in and around Sherwood Oaks:
  - f. Those utilizing proximity to public transportation and potential open public space in the Park and Ride or surrounding areas as shelter / room for encampments as per previous observations and documentation in Austin with similar public amenity.
  - g. Potential for increase in unhoused population to make use of the Blunn Creek Nature Preserve as potential place of encampment due to proximity of southern most Oltorf station / Park and Ride.
    - i. Potential disruption to safety of residential property in proximity to the Preserve and public utilizing the Preserve.
    - ii. Increase in trash.
    - iii. Disruption of fragile natural ecosystems within the Preserve.
  - h. Potential impact of increased unhoused population 0.9 miles from Travis Heights Elementary, 0.6 miles from Lively Middle School, 0.2 miles from St. Ignatius Martyr School, and 0.8. miles from Travis High School, therefore threatening safety of students and their ability to walk / cycle to school.

In response to these concerns we request:

- i. A traffic impact analysis to be required to examine, determine the feasibility, and document the real potential effects of vehicular impact to Sherwood Oaks and surrounding areas.
- ii. Request for movement of the southernmost Oltorf station to an area with less or omitted impact on residential, public land, and public school safety.

## TRAVIS HEIGHTS

### **Intersections & Congestion**

While the EIS shows some improvements in 41% of the 72 intersections identified in Project Connect during PM peak period the other 59% either stay the same or show significant downgrades.

There is an unknown number of units proposed on 118 acre waterfront tract at Riverside Dr. and South Congress but according to a project TIA it needs additional left-turn capacity at this intersection because of the massive amount of new units added in the redevelopment of the 118 acres.

The intersection at Oltorf and South Congress is currently failing and the redevelopment of the Twin Oaks Shopping Center site will increase traffic volumes. It is important to note that HEB could not make this site work for its new facility because of traffic considerations.

**Conclusion:** The addition of a center lane light rail line and new bridge over Lady Bird Lake will not allow for needed safety improvements called for in the TIA at Riverside and South Congress. It does not improve major intersections in the neighborhood and actually degrades one minor one significantly. All the major intersections on South Congress will become more congested as result of new development and using necessary existing roadway capacity for light rail. There is simply no evidence to show that ridership on the light rail will improve congestion.

### **Parking**

The plan eliminates 607 on-street parking spaces in the project area including eliminating 358 parking spaces along South Congress. The plan seeks to alleviate some of this impact with a parking garage on Long Bow Lane. This facility has the potential to conflict with the long-term parking needs of the Juvenile Justice facility. The planned parking does not address the needs of South Congress businesses to have parking more appropriate for their retail traffic.

The elimination of parking on South Congress will have unintended consequences for all neighborhoods adjacent to South Congress. Already difficult on-street parking will come under even further pressure. The conflict

between residents and people experiencing South Congress will be further exacerbated.

South Congress is a street that has a mixture of pedestrians, scooters, and bikes at all times of day. Re configuring the space on sidewalks because of center light rail will cause increased conflict among the many forms of transportation. In the end, retail operations will find the competition of sidewalk space detrimental.

Successful retail needs access to parking spaces. The success of South Congress business district and parking are inextricably linked.

### **Social Justice and Equity**

Project Connect was heavily marketed by the City and the political campaign to pass the proposition as the solution to past inequities created by infrastructure. The predominately lower income neighborhoods of Austin are receiving no benefit from the rail line. The South and East, where any lower income residents reside, are projected to have 13% and 20% of the ridership respectively.

The low-income housing is not dispersed throughout the corridor and the development ordinances that were passed in conjunction with Project Connect show little signs of guaranteeing any affordable housing in the corridor. The proposed low-income housing has no time table and is in the indefinite future.

The promised plan benefits of Shade Tree Facilities and pedestrian amenities along the East Riverside Dr. corridor could be achieved without the build scenario. The irony of this plan passed in the name of social justice is that the least desirable feature, the switching yard, is placed in Montopolis, one of the few areas in the scope of the plan does have some low income housing.