



# Texas Department of Transportation

San Antonio Mobility Initiative Office • 16620 North US 281 • San Antonio, Texas 78232 • (210) 403-4300

April 5, 2007

*file original*  
*FB*

Terry M. Brechtel  
Executive Director  
Alamo Regional Mobility Authority  
16500 San Pedro, Suite 350  
San Antonio, Texas 78232

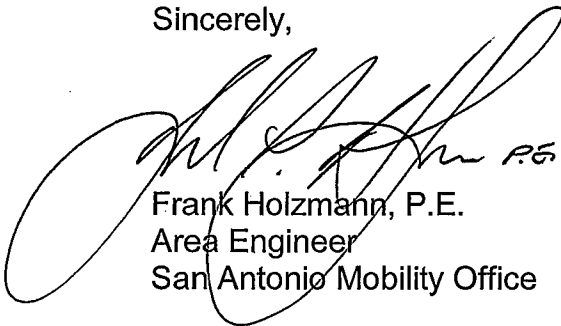
RE: CSJ 0291-10-055  
SH 16 (Bandera Road)  
Bexar County

Dear Terry:

Attached is a letter dated March 29, 2007 from Mr. Salvador Deocampo, District Engineer for the Federal Highway Administration. In his letter to the Environmental Affairs Division of TxDOT, he states that an Environmental Impact Statement (EIS) should be prepared for the project referenced above.

If you have any questions concerning the content of the attached letter, please contact me at (210) 403-4300.

Sincerely,



Frank Holzmann, P.E.  
Area Engineer  
San Antonio Mobility Office

Attachment: FHWA Letter

Cc: SAMIO  
Judy Friesenhahn, P.E. (TP&D)



U.S. Department  
of Transportation  
**Federal Highway  
Administration**

**Texas Division**

March 29, 2007

826 Federal Office Building  
300 E. 8th Street  
Austin, TX 78701

CSJ: 0291-10-055  
SH 16 (Bandera Road)  
Bexar County

In Reply Refer To:  
**RECEIVED**

MAR 30 2007

**ENV**

Mr. James P. Barta, Jr. P.E.  
Director, Project Management Section  
Environmental Affairs Division  
Texas Department of Transportation  
125 E. 11th Street  
Austin, Texas 78701-2483

Dear Mr. Barta:

We have reviewed the information submitted by your letter of February 23, 2007. This information included supplemental information we had requested from TxDOT and the Alamo Regional Mobility Authority (ARMA) in our letter dated December 18, 2006, related to the ARMA's request to do an Environmental Assessment of the proposed SH 16 project from IH 410 to Loop 1604. This request was made originally by TxDOT's letter of July 26, 2006. After our initial requests for additional information were addressed, TxDOT submitted a follow up letter on November 14, 2006. A meeting of representatives of the ARMA, TxDOT and FHWA was held on January 12, 2007, in San Antonio to discuss the project and the appropriate environmental document.

This proposed project is for the expansion of SH 16 (Bandera Road) from IH 410 to Loop 1604, a total distance of about 6.5 miles. This portion of SH 16 passes through the Cities of San Antonio and Leon Valley. Currently SH 16 is a 6-lane urban arterial from IH 410 to Guilbeau Road and a 4-lane urban arterial from Guilbeau Road to LP 1604. The existing right-of-way is 120 feet to 203 feet wide. The proposed upgrade (according to the San Antonio MPO's Mobility 2030 Plan) would add 4 lanes of new, tolled capacity to the entire corridor. About 21 alternatives have been suggested for this corridor including non-capacity adding alternatives. No recent environmental studies exist for this corridor.

Our finding is that an Environmental Impact Statement (EIS) should be prepared in accordance with 23 CFR 771.119 and SAFTEA-LU Section 6002 for this project. This decision is based on several factors. First, SH 16 from IH 10 to LP 1604 is a moderate to densely developed urban corridor with development beginning at the right-of-way line. As such, the expansion of SH 16 to include controlled access lanes where there are none now could have a high probability of significant economic impacts to the businesses in the corridor. The loss of parking and reduced access at a minimum is likely to result from any addition of new travel lanes within the corridor. In some cases, actual acquisition of the business is a possibility.

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**ECONOMY**

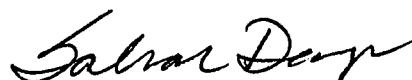


Placing the new capacity on an elevated structure or within a tunnel has been discussed as alternatives which might mitigate the economic impact to the business. But these alternatives come with significantly higher construction costs. We also feel there will be higher noise and visual impacts from an elevated structure. In addition, public comment appears to prefer an at-grade or depressed roadway. While this corridor is developed with mostly commercial development, there is some residential development, much of it in the form of multi-family dwellings. Impacts are possible to some of these units.

Second, the potential for significant controversy appears likely on this project. As mentioned above, public comment has already been received from a public meeting held July 27, 2006. At that public meeting, the public expressed project impact concerns specifically about the O. P. Schnabel property and the Onion House. There is ample evidence that the public is generally resistant to the use of tolling on projects of this type. Also, the City of Leon Valley is on record at the Agency Coordination Meeting held on June 15, 2006, as being opposed to an elevated structure and any alternative which separates through traffic from local traffic. The City is concerned about the potential economic impact to the businesses and the City of any such separation. Third, the existence of at least one park, a potentially historic structure and a school along the existing right-of-way increases the likelihood of significant impacts under the 4(f) and section 106 processes.

Should you have any questions regarding this determination, please contact me at 536-5950, Mr. Ted West at 536-5959 or Mr. Jesse Balleza at 536-5943. We look forward to working with TxDOT on this proposed project.

Sincerely,



Salvador Deocampo  
District Engineer