

OFFICE OF THE MAYOR
HOMEWOOD, ALABAMA

Scott McBrayer
Mayor

February 8, 2010

The Honorable Joe McInnes,
Transportation Director
Alabama Department of Transportation
P. O. Box 303050
Montgomery, Alabama 36130-3050

Re: U.S. 280

Dear Mr. McInnes:

On January 11, 2010, Alabama Department of Transportation ("ALDOT") engineers Brian Davis and Lance Taylor presented your current plan to address traffic congestion on U.S. 280 to the Homewood City Council. Additionally, we received a letter dated January 15 from William F. Adams, with ALDOT's Environmental Technical Section, which solicits our views concerning this proposed project. We are very pleased to be a part of the continuing conversation about the future of the U.S. 280 corridor. We look forward to working further with you and ALDOT on this important issue for the City of Homewood.

As we indicated at the time of the presentation, we wanted a chance to review and study some of the information provided. We have had an opportunity to do that and offer the following comments and concerns for your consideration.

- *Mayor McCulley March 16, 2007 Request:* When Homewood Mayor Barry McCulley joined in a request to ALDOT for grade separation studies for the western corridor of U.S. 280, he in no way envisioned the 10-lane Atlanta-style tolled freeway that is part of your current plan. In that letter the City of Homewood asked ALDOT to study the grade-separated, parkway concept for the western section of U.S. 280 presented by Glatting Jackson, not a 10-lane freeway. We believe that the construction of such an expanded freeway is the wrong solution not just for Homewood specifically but also for U.S. 280 congestion in general. Homewood was not a part of the Hatch Mott MacDonald study commissioned by the City of Mountain Brook, and we do not support the inclusion of additional lanes in Homewood as contained in either that plan or your current proposal.
- *U.S. 280 Alternative:* As you may be aware, nationally renowned public interest traffic consultant Walter Kulash recently presented an alternative concept to your plan to ease U.S. 280 traffic congestion. That concept is being refined and will be presented to Governor Riley and ALDOT in the next 30 days. We urge you to seriously and carefully consider this alternative concept.

It accomplishes the goal of uninterrupted flow of traffic on U.S. 280 without damaging nearby communities and businesses. It is environmentally sensitive and (for the future) transit-friendly. At approximately \$440 million dollars, it is much less costly than your current plan and a better fit for the communities and businesses along the corridor. Finally, it accomplishes your stated goal of expanding capacity on U.S. 280 by largely separating through and local trips. We look forward to discussing the merits of this plan with you at a later date.

- *E. B. Stephens Expressway:* “Any benefits associated with increased capacity on U.S. 280 would be negated by the operational limitations of the interchange at the E. B. Stephens Expressway,” according to a study commissioned by the Regional Planning Commission of Greater Birmingham (“RPC”) in 2005. Transitioning from the 10 lanes of the expanded freeway to the 6 of the Expressway effectively creates a giant parking lot in the midst of our City, which would restrict and complicate access to our vital downtown shopping district. The problem that Chief Engineer Don Vaughan acknowledges in a recent *Birmingham News* article—“we realized we were creating a problem” if the increased number of lanes were not carried all the way to the Expressway—has not been solved. It has just been moved from the I-459 area to the Cities of Homewood and Mountain Brook. Respectfully, we urge you to reconsider any plan for U.S. 280 that provides for more than 6 lanes in the City of Homewood.
- *Community Planning and Transit:* As you may be aware, in addition to the 2005 study referenced above, the RPC is currently conducting a U.S. 280 Corridor Transit Study. We believe it appropriate to consider the conclusions of the 2005 study as well as to await the conclusions of the current transit study before settling on an appropriate remedy for U.S. 280 traffic congestion. Homewood Mayor Scott McBrayer has formally requested that the RPC include the Kulash plan in its transit study. Because ALDOT does not engage in community planning when considering the impact of highways on surrounding communities, we believe it critical that ALDOT rely on some the planning work performed by the RPC. The Birmingham metro region has grown past the point where ALDOT can build a project the size of the current concept and hope for a good outcome without regard to surrounding communities or future mass transit options.
- *Impact on Commercial Tax Revenue:* One big concern is the effect the 10-lane freeway would have on our commercial tax base in the City of Homewood. As mentioned previously, depending upon the number of lanes and how access to Homewood is redesigned at the Expressway, your plan could restrict or complicate access to our downtown business district. Additionally, rather than make Brookwood Mall and the surrounding commercial area an easy destination for U.S. 280 traffic, your proposed toll road would bypass it, making commuters far less likely to shop there. A secondary effect of a decrease in our commercial tax base would be great harm to the services we provide as well as our award-winning school system, which is funded in part by these revenues. The ALDOT engineers, while able to offer specifics about parts of your plan, could not tell us how the intersections of U.S. 31, U.S. 280,

and the Expressway would be redesigned. Because that is a critical part of the project for us, we ask that as those plans are developed that we be provided with them as soon as they are available. We also request that the potential impact on our commercial areas be an important part of any plans to reconfigure access to the City of Homewood.

- *Hollywood Historic District:* The City of Homewood is home to Hollywood, one of Birmingham's oldest and most unique communities. In 2002 Hollywood, bordered by U.S. 280, was listed by the National Register of Historic Places. Any plan to relieve traffic congestion on U.S. 280 must be extraordinarily sensitive in its demands upon this neighborhood. In certain locations, U.S. 280 is already fewer than 100 feet from homes in this neighborhood and your plan proposes to bring the highway even closer. The 10-lane freeway and the Hollywood Blvd/Office Park toll plaza under consideration in your current plan would be devastating to the quality of life and real estate values of Hollywood. The Kulash alternative, while providing for the uninterrupted flow of traffic on U.S. 280, preserves and respects this beautiful, historic neighborhood.
- *Rosedale and Rosedale Park Historic Districts:* Added to the National Register in 2004, this historic Homewood neighborhood is at the juncture of U.S. 280 and the EBS Expressway. Depending upon how the access from U.S. 280 to the EBS Expressway is designed, your plan could negatively affect property values and quality of life for residents of this neighborhood as well.
- *Proximity to Schools and Homes:* The 10-lane freeway you propose is close to at least three area elementary schools in the eastern section, including Shades Cahaba Elementary School in Homewood. The American Lung Association recommends against locating these kinds of highways within a half mile of schools. Infants and children may be especially susceptible to the health effects of pollution, because their lungs are still developing. Children also have greater exposure to air pollution because of their faster breathing rates and the increased amount of time spent playing. The expansion of U.S. 280 that is part of your current plan would greatly harm the residents of Hollywood and the children who attend Shades Cahaba.
- *Jefferson County Air Pollution:* The Birmingham metro area already ranks with much larger cities like Los Angeles in poor air quality according to the American Lung Association; that group gave Jefferson County a grade of "F" for ozone (smog). Any promised short-term improvements in air quality which may be realized by decreasing the traffic congestion on U.S. 280 will quickly be eclipsed by both the greater number of cars that will be on the road and the bottleneck your plan creates at the EBS Expressway.
- *Environmental Studies:* The City of Homewood supports the performance of all necessary environmental studies incident to the implementation of any plan to increase capacity on U.S. 280, including, but not limited to, a complete environmental study as well as noise and vibration studies. Moreover, if any kind of expanded freeway is constructed in Homewood, we ask that appropriate, state-of-the-art noise mitigation features be implemented. Additionally, we are concerned about the impact of your current plan on the

drinking water provided to the residents of our City. Your engineers candidly concede that the right of way for the 10-lane freeway you propose is narrowest at the Birmingham Water Works and presents a difficult technical problem in terms of how to expand the highway there. We believe that the construction of an expanded highway so close to the primary source of our drinking water would be a grave mistake. The impact of your plan on the Birmingham Water Works should be part of any environmental studies conducted.

- *Traffic Counts and Toll Projections Do Not Justify the Project:* According to 2008 traffic count figures on the ALDOT web site, the average daily traffic count on U.S. 280 is 66,700 between the EBS Expressway and Eagle Point, with the highest traffic counts in the Inverness area at 82,690. Most of the traffic counts are less than 65,000 vehicles per day, or approximately two thirds of the figure Governor Riley has referenced in his public statements about the plan. ALDOT's assumption that traffic counts will increase by as much as 44% on U.S. 280 over the next several years runs counter to both traffic trends nationally and regionally, as well as recent development trends in Shelby County. The projected toll revenue based upon these inflated figures will not cover the project's debt service, much less the operating and ongoing capital costs of the toll road.
- *Adding Lanes Will Not Solve the Problem:* The brief history of U.S. 280 in Homewood demonstrates what urban designers and transportation professionals everywhere know: adding lanes does not solve the problem. Traffic studies show that building or widening highways, induces *more* traffic; typically it will grow to fill 10% to 50% of the new capacity within the first three years and 50% to 100% at thirteen years. U.S. 280 is a good example of how this phenomenon plays out: when it was built and later more lanes were added, it was filled to capacity each time in less than ten years. Building the massively expanded highway contemplated by your plan would ultimately only exacerbate—not solve—the problem of traffic congestion on U.S. 280. By contrast, the Kulash plan uses and repurposes the existing infrastructure to create express lanes that allow the uninterrupted flow of traffic and alleviate traffic. Rather than the massive urban freeway of your proposal, the Kulash plan creates an urban expressway that will address congestion without inducing even more traffic congestion at a substantially lower cost than the current state-endorsed plan.
- *Rebuilding the Access Ramp That Connects the Expressway to U.S. 280:* The City of Homewood supports moving this access ramp away from the Hollywood neighborhood to provide an opportunity for more landscaping and buffering between it and the Hollywood neighborhood as suggested by your current plan. This poorly functioning and dangerous access ramp has been the site of numerous traffic accidents, including one fatality and at least two hazardous materials spills. Regardless of what solutions are ultimately imposed upon the corridor, it is essential that this ramp be moved and re-engineered in the interest of public safety. We ask that as the plans are developed to redesign this ramp that we are provided with them as soon as they are available.

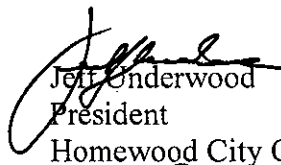
- *Studies Performed:* The City of Homewood requests a copy of the justification study for the toll road plan. Given that the project is being fast tracked, with legal counsel and investment banking services already being solicited, we would like a copy of that study right away. Additionally, if you are relying on any environmental studies performed to date, we would like copies of those as well. Please send the copies to the attention of Mayor McBrayer.

Please know that we appreciate that solutions to the issue of traffic congestion on U.S. 280 are not simple, easy, or inexpensive. However, we believe based on the very limited information you have provided to date, that your proposal would greatly harm not just the City of Homewood, but all of the established communities along the corridor. We urge you instead to develop a fair and sensible plan that addresses traffic congestion while considering the impact upon the surrounding communities and businesses. We look forward to working with you to assure the very best result possible for all stakeholders along the corridor.

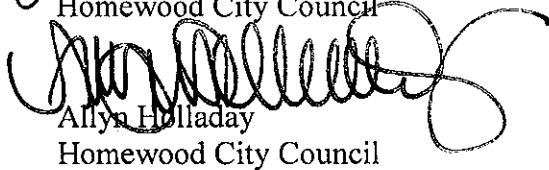
Sincerely,



Scott McBrayer
Mayor
City of Homewood



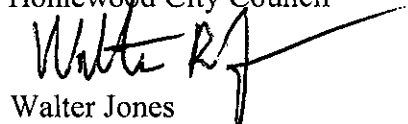
Jeff Underwood
President
Homewood City Council



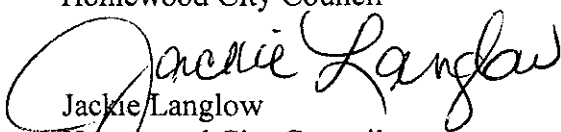
Allyn Holladay
Homewood City Council



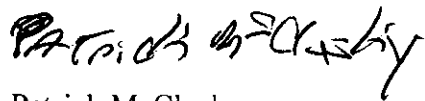
David Hooks
Homewood City Council



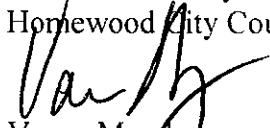
Walter Jones
Homewood City Council



Jackie Langlow
Homewood City Council



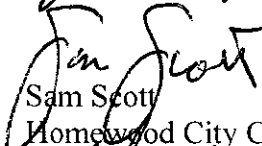
Patrick McClusky
Homewood City Council



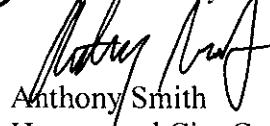
Vance Moody
Homewood City Council



Hunter Payne
Homewood City Council



Sam Scott
Homewood City Council



Anthony Smith
Homewood City Council



Allan Trippe
Homewood City Council

cc: The Honorable Bob Riley, Governor

Mr. Don Vaughan,
ALDOT Chief Engineer and Depute Director

Mr. William F. Adams,
ALDOT Design Engineer

Mr. Alfredo Acoff, Coordinator
ALDOT Environmental Technical Section

Mr. Brian Davis,
ALDOT Third Division Engineer

Mr. Lance Taylor,
ALDOT Third Division Assistant Engineer

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February 8, 2010

Charles Ball, Executive Director
Regional Planning Commission of Greater Birmingham
1731 First Avenue North, Ste 200
Birmingham, Alabama 35203

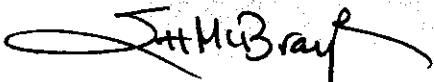
Dear Mr. Ball:

The Homewood City Council and I have recently drafted a letter to the Alabama Department of Transportation regarding the U. S. 280 Corridor. In this letter, I referenced the 2005 study performed by the Regional Planning Commission, and also mentioned the current U. S. 280 Corridor Transit Study being performed now. We believe that it is necessary to consider the conclusions of the 2005 study along with those of the current study before any work is performed by ALDOT.

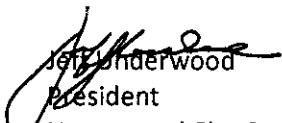
Please accept this letter as my formal request that you include the Kulash plan in your transit study. Because the Alabama Department of Transportation (ALDOT) does not engage in community planning when considering the impact of highways on communities, we believe it is critical that they rely on some of the planning work performed by the RPC.

I appreciate very much your consideration and if I or my office may be of further assistance, please do not hesitate to call 205-332-6103. The City Council is also signing this letter to show our full support within our government here in Homewood. With kindest regards I remain

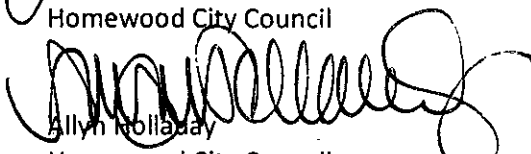
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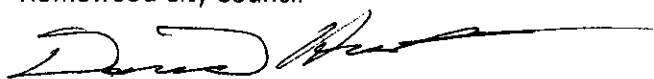
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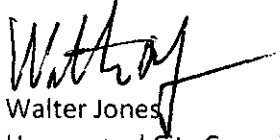
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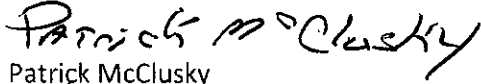
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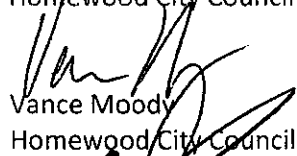
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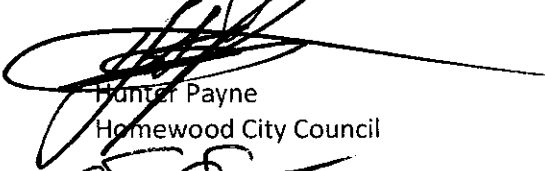
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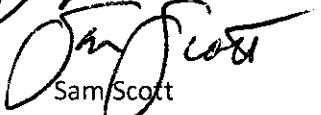
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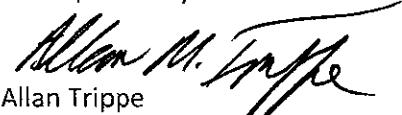
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