

**JOINT STATEMENT AND RECOMMENDATIONS OF BARTON HILLS
NEIGHBORHOOD ASSOCIATION, ZILKER NEIGHBORHOOD
ASSOCIATION, SAVE OUR SPRINGS ALLIANCE, CITY COUNCIL
DISTRICT 7 AND CITY COUNCIL DISTRICT 5 (JUNE 4, 2019)

RELATING TO THE USE OF ZILKER METROPOLITAN PARK
STRATFORD DRIVE-BUTLER LANDFILL AND POLO FIELDS**

Background

The undersigned individuals, in our representative capacities, respectfully submit this Joint Statement and Recommendations to the Mayor and City Council. We actively participated as duly appointed, voting members of the *Zilker Park Working Group* (ZPWG) established pursuant to City Council Resolution 20180628-072.

The ZPWG failed in its essential mission of finding a consensus plan for the future use of the Stratford Drive-Butler Landfill area (Butler Landfill) and Polo Fields. Despite our efforts to contribute to and clarify the recommendations in the main section of the Zilker Park Working Group Final Report (ZPWG Final Report), that document does not fully or accurately convey our unified position on certain key issues assigned to the ZPWG by the Mayor and Council.

Recommendations for Immediate Action by the Mayor and Council

In the absence of action by City leadership, we are concerned that the ZPWG Final Report will do little more than serve notice that the key controversies that bogged down the ZPWG are being postponed to the master planning process.

The lesson learned over the nearly nine months of meetings and deliberations by the group and its sub-groups is that in order to make any real and lasting progress toward the resolution of these difficult issues, the Mayor and Council must make hard choices, set firm timelines and establish clear expectations that are reflective of the public's consistent demand for parks that are a natural experience in environmentally protected settings and that are **not** highly developed, overprogrammed, semi-privatized parking lots or staging areas.¹

Accordingly, we recommend that the Mayor and Council take four immediate steps to express its intention to protect approximately 20 acres of Zilker Park that are currently used in an unauthorized manner that violates environmental regulations designed to protect this parkland:

1. Adopt the Environmental Commission's unanimous recommendation dated June 20, 2018 (Resolution 20180620 007a, attached as Exhibit 1), to **deny** the so-called "Atkins Plan" redevelopment of the Stratford Drive-Butler Landfill sponsored by PARD, C3 Presents and the Austin Parks Foundation;

¹ See recent article in Austin American Statesman: <https://www.statesman.com/news/20190501/quit-putting-concrete-in-parks-austinites-weigh-in-ahead-of-10-year-plan>

2. Adopt a maximum 4-year timeline for the master plan process to deliver a plan that restores the Stratford Drive-Butler Landfill area to permanent open, useable green space;
3. Adopt a similar maximum 4-year target date for the master plan process to provide a plan for the elimination of **all** parking from the Polo Fields, including overflow park use and parking for special events. Unless all unauthorized parking is eliminated, this parkland cannot be revegetated, irrigated and reprogrammed for recreational use;
4. Adopt the set of consensus recommendations of the ZPWG related to both short-term transportation solutions and clearing the six-acre area of the Stratford Drive-Butler Landfill known as the “boneyard” (area west of MoPac) by removing the collection of rubbish, surplus equipment, and dumpsters.

If the City takes these four actions before the selection of the main consultant for the master planning process, the expectations of that critically important process will be focused toward delivering a realistic, park centric, environmentally sound plan rather than being yet another platform for an extended re-hashing of the controversial “Atkins Plan” for Butler Landfill and the equally controversial “parking lot swap” that would move Polo Field parking onto Butler Landfill.

Recommendations for Medium and Long-Term Action

In addition, we recommend that the Mayor and Council establish a set of “Guiding Principles” and other specific measurable goals that will direct PARD’s medium term actions for the management of Zilker Park as well as through the Zilker Park master planning process as follows:

1. Guiding Principle-PARD should preserve and protect Zilker Park as an irreplaceable public asset to be operated primarily as open space for present and future generations;
2. Guiding Principle-All special event uses of Zilker Park should meet the highest standards of environmental ethics and sustainability and provide utilization of parking and transportation alternatives, compatibility with community values, and opportunities for immediate and direct community input to resolve questions and concerns;
3. Guiding Principle-The Zilker Park Master Plan should establish a viable, actionable plan that minimizes vehicular traffic in and through the park and surrounding neighborhoods by identifying a range of alternative, affordable transportation and parking strategies for park patrons;
4. Guiding Principle-Direct the City Manager to assure that all consultants hired or assigned to the Zilker Park master planning process are free of conflicts of interest with any organization that generates revenue from or has contracts with the City of Austin relating to events held or operations conducted in Zilker Park and the Butler Hike and Bike Trail;
5. Authorize PARD and the Austin Transportation Department to expend revenue generated by parking fees in Zilker Park for the rental of off-site parking and shuttle services to serve Zilker Park and related public education programs;

6. Direct PARD to remove the “temporary” and non-compliant placement of the gravel on the Landfill and revegetate the area no later than summer of 2020 in accordance with the long-standing demand from City of Austin Watershed Protection Department; beyond 2020 and prior to completion of the Master Plan, find an alternative method to protect the surface of the landfill if used for staging or parking;
7. Direct PARD to begin immediate implementation of the 2016 Parkland Events Task Force recommendation to establish a more equitable distribution of opportunities for special events in parks across the Austin area that will also provide alternative sites for events now occurring at over-utilized urban parks. Direct PARD to assure that affected neighborhoods have a formal role in the decisions about and planning for events at nearby parks;
8. Direct PARD to establish higher standards of transparency in its planning, operation, and expenditures relating to Zilker Park to allow direct public access to a broader range of information in anticipation of the Zilker Park master planning process;
9. Direct appropriate staff to create a publicly available web-based repository for all documents relating to the Zilker Park master planning process, including copies of contracts with consultants, public surveys, list of stakeholders, results of interviews with stakeholders, and searchable survey result files; and
10. Assure the public that the Zilker Park master planning process will not be unfairly controlled by special interests that seek to monetize this parkland.

We Do Not Support Several Key Recommendations in the ZPWG Final Report

While many individuals, including the working group Chair, Vice-Chair and sub-group leaders, contributed many hours of work and made good faith efforts to allow the members a full and fair opportunity to express various opinions during the meetings, many of the ZPWG Final Report recommendations relating to the Stratford Drive-Butler Landfill Plan and Polo Fields simply miss the mark.

The core recommendation of the ZPWG Final Report for the Butler Landfill is to leave the multi-acre expanse of gravel on the Butler Landfill for an undefined period of time. This recommendation is directly contrary to the long-standing directive from the Watershed Protection Department that C3 remove the existing rock and gravel from the Landfill and revegetate the area to protect the cover of the landfill (see Exhibit 2). Nor does this recommendation address the issue of parkland being transformed into parking lots, a concern we expressed in 2019 to the Parks and Recreation Board and the Environmental Commission, which led to the formation of this Working Group. This “do nothing” approach of the ZPWG Final Report assures that the controversies surrounding the Butler Landfill will continue unresolved.

Unstated in the ZPWG Final Report is the fact that the controversial “Atkins Plan” did not garner sufficient support among the group to even come to a vote. It is time for the Mayor and Council to end the community’s long simmering anxiety concerning this plan to turn 7.5 lake-front acres of Zilker Park into a bed of ballast stone by explicitly rejecting that plan, allowing the community to move on to other solutions.

The ZPWG Final Report provisions relating to the Polo Fields attempted to address not just the Polo Field parking, but also includes various findings and conclusions as to the use of Butler Landfill and transportation options. The Polo Field report was presented to the ZPWG for deliberation during the last hour of the special-called final meeting of the ZPWG on May 30th and was met with confusion and disagreement over its wording.

The full Polo Field sub-group report (attachment to the ZPWG Final Report) contains multiple ambiguities and misleading or incorrect “facts,” as well as conflicting, controversial suppositions that appear to us to be an attempt to support the swap of parking on Polo Fields for a development of a permanent parking lot on Butler Landfill, a proposition that we vigorously oppose. In our deliberations, an oft-repeated statement was that the Polo Field was more environmentally sensitive than the Butler Landfill, and although it appears there is not enough evidence to support that statement, the environmental regulations are extensive for both (see Exhibit 3).

Conclusion

Ultimately, it is up to the Mayor and Council to direct and fund the planning and execution of strategies that will protect Zilker Park for future generations. This is a critical point in time to plan for moving the community away from the use of private passenger automobiles (consistent with the 2019 Austin Strategic Mobility Plan) as the primary means of access to Zilker Park.

Zilker Park is currently being used in ways that are not only unsustainable, particularly during peak times and special events, but illegal under the City’s own regulations. Immediate steps are required by our City’s leadership to reassure the public that this incredibly valuable asset will remain a symbol of the core values of this community.

Respectfully Submitted,



Mark Gentle, President of Barton Hills Neighborhood Association



Bruce Wiland, Treasurer of Zilker Neighborhood Association



Bobby Levinski, Staff Attorney, Save Our Springs Alliance



Roy Waley, Appointed Representative of City Council District 7



Gail Rothe, Appointed Representative of City Council District 5

EXHIBIT 1

ENVIRONMENTAL COMMISSION RESOLUTION



ENVIRONMENTAL COMMISSION MOTION 20180620 007a

Date: June 20, 2018

Subject: Zilker Park – Stratford Drive landfill maintenance, staging and temporary parking area

Motion by: Linda Guerrero

Seconded by: Mary Ann Neely

RATIONALE:

WHEREAS, parking and staging challenges have placed excessive strain on a large portion of the seven acre Zilker Park - Butler capped landfill; and

WHEREAS, usage as a festival and event grounds has contributed to environmental problems; and

WHEREAS, environmental concerns that currently exist, such as water quality issues, erosion, dust, and exposure to the decomposing landfill need to be addressed; and

WHEREAS, the Environmental Commission oversees the review of policies that relate to improvement and protection of the Colorado River, parkland, and land use planning; and

WHEREAS, the Environmental Commission's purpose is to oversee the protection and integrity of the natural environment, protect and preserve public trees, assure safety, welfare, and quality of life for all citizens; and

WHEREAS, the Parkland Events Task Force recommended eliminating use of green space parking such as the polo field at Zilker Park; and

WHEREAS, the residents of Austin need more open space and parkland in the urban core to provide quality of life; and

WHEREAS, the potential stabilization of the Stratford Drive Zilker Park - Butler landfill cap for the proposed project lacks long term solutions for resolving the parking and staging, soil, landfill condition concerns, drainage and erosion issues, and superior design; and

WHEREAS, there is lack of data from the existing three monitoring wells, community notification and public process, and inconsistent information regarding proposed solutions to the multi-faceted project.

NOW, THEREFORE, BE IT RESOLVED that the Environmental Commission recommends denial of the Stratford Drive Zilker Park - Butler landfill redevelopment project as currently proposed.

BE IT FURTHER RESOLVED, the Environmental Commission recommends that any proposed project moves forward only after the following solutions have been addressed and resolved prior to any activity on the Stratford Drive Zilker Park - Butler landfill area:

- Secure money for a Zilker Park Master Plan within two years, have a contract for master planning within three years, and complete the Master Plan within five years. The elements of the Master Plan would include:
 - Conducting a comprehensive study to assess parking and mass transportation needs
 - Provide a transparent community outreach plan to solicit and incorporate public input and feedback
 - Propose options and estimates for revegetation and restoring the landfill into a safe, usable, and open green space within six years.
- Find alternate parking areas to use for scheduled events and for the Zilker Botanical Gardens and the Austin Nature and Science Center.
- Clearly differentiate between the three separate project issues:
 1. Traffic and parking
 2. Deterioration of the landfill cap
 3. Rehabilitation of the polo fields.
- Require C3 to find alternative parking for all large trucks and trailered vehicles, and to eliminate all heavy loads on the Stratford Drive Zilker Park - Butler landfill site.
- Secure money to rehabilitate the polo fields with a timeline demonstrating each of the stages.
- Provide a detailed assessment of how the proposed improvements comply with the maximum impervious cover allowed within the primary and secondary Waterfront Overlay.
- Ensure compliance with Texas Commission on Environmental Quality requirements for the landfill cap.

VOTE 9-0

For: B. Smith, Creel, Thompson, Neely, H. Smith, Guerrero, Gordon, Coyne, and Maceo

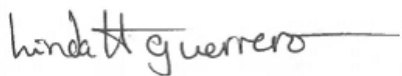
Against: None

Abstain: None

Recuse: None

Absent: Perales

Approved By:



Linda Guerrero, Environmental Commission Chair

EXHIBIT 2

CITY OF AUSTIN EMAIL AND DRAFT MEMO
RELATING TO GRAVEL REMOVAL
FROM BUTLER LANDFILL

Esquivel, Joan

From: Lesniak, Chuck
Sent: Thursday, August 04, 2016 2:35 PM
To: Arnold, Tony [PARD]
Cc: Stump, Marty; Kallivoka, Liana [PARD]; Mike Walker [REDACTED]; Sokol, Lindsey; Robinson, Elizabeth [Beth]; McKown, OB
Subject: RE: Zilker Parking Lot

Tony,

Beth and I discussed the project again. Our opinion is that under a short timeline it is maintenance, not development, so no development permit (general or otherwise) is required. However, for us to consider it maintenance it needs to be temporary protection of the existing vegetation and landfill cap. We don't feel that having it there for 5 months is temporary. To be considered maintenance the gravel needs to be removed within 2 weeks after the last weekend of ACL and revegetation/irrigation installed per the standard revegetation criteria. If the gravel needs to be there longer, we would consider it development and the project would need to be covered by the General Permit and reviewed by OB and his staff or a regular site plan (it's too big an area for a site plan exemption).

Lastly, so that everyone is clear and understands the conditions to do the work we would like something in writing from a PARD Assistant Director and from C3, if they are going to be responsible for any portion of the project, laying out the plan and timeline and agreeing to abide by it.

Let me know if you have any questions.

Chuck Lesniak, Environmental Officer
Watershed Protection Department

From: Arnold, Tony [PARD]
Sent: Thursday, August 4, 2016 9:22 AM
To: Lesniak, Chuck
Cc: Stump, Marty ; Kallivoka, Liana ; Mike Walker [REDACTED] ; Lindsey Sokol ; Robinson, Elizabeth [Beth] ; McKown, OB
Subject: RE: Zilker Parking Lot

Thank you sir, again my apologies, I had been so focused on getting this done for ACL, I failed to mention the time frame. I will wait to hear from you.

From: Lesniak, Chuck
Sent: Thursday, August 04, 2016 9:09 AM
To: Arnold, Tony [PARD] <Tony.Arnold2@austintexas.gov>
Cc: Stump, Marty <Marty.Stump@austintexas.gov>; Kallivoka, Liana <Liana.Kallivoka@austintexas.gov>; Mike Walker [REDACTED] <[\[REDACTED\]@austintexas.gov](mailto:[REDACTED]@austintexas.gov)>; Lindsey Sokol <[\[REDACTED\]@austintexas.gov](mailto:[REDACTED]@austintexas.gov)>; Robinson, Elizabeth [Beth] <Elizabeth.Robinson@austintexas.gov>; McKown, OB <OB.McKown@austintexas.gov>
Subject: RE: Zilker Parking Lot

Tony,

That changes things for me. Let me discuss with Beth and we'll get back to you. Please don't proceed with any work until we talk. Thanks,

Chuck

From: Arnold, Tony [PARD]
Sent: Thursday, August 4, 2016 8:35 AM
To: Lesniak, Chuck
Cc: Stump, Marty; Kallivoka, Liana; Mike Walker [REDACTED]; Lindsey Sokol; Robinson, Elizabeth [Beth]; McKown, OB
Subject: Re: Zilker Parking Lot

My apologies for not clarifying, TOL overlaps with ACL making it difficult to do the removal. I am hoping you can agree that we have the gravel removed by Jan 15. That would be approx 107 days.

Sent from my iPhone

On Aug 3, 2016, at 4:10 PM, Lesniak, Chuck <chuck.lesniak@austintexas.gov> wrote:

Tony,
Beth and I understood that the gravel would come out after ACL, not after TOL. That's a much longer time frame that we're not comfortable with. With that change, we're good with what you wrote up.
Thanks,

Chuck

From: Arnold, Tony [PARD]
Sent: Wednesday, August 3, 2016 2:11 PM
To: Stump, Marty; Kallivoka, Liana; Mike Walker [REDACTED] Lindsey Sokol
Cc: Lesniak, Chuck; Robinson, Elizabeth [Beth]; McKown, OB
Subject: Zilker Parking Lot

All,

Good Afternoon, I met with Beth and Chuck Yesterday afternoon and they have both agreed that this can move forward in the smaller section of land as we had discussed in our latest meeting. There are a couple of caveat's that I agree with as we move forward:

1. I will prepare a letter to TCEQ indicating what we are doing and why to keep them in the loop.
2. I have agreed that we will place 6 inches \pm 1" of clean Gravel (Ballast) in the gradation provide by C-3.
3. The gravel will be removed upon exit of Trail of Lights (TOL) and the area impacted vegetated and a Temp irrigation system placed to water in seeding.
4. C-3 will need to install mulch sock along the upper slope of the existing swale along the trail and at the entrance of the pipe passing under the trail to collect any fines from the graveled or unraveled area during operations and removed after TOL.
5. WE agreed in the meeting that any work beyond this level will need a full sigh plan moving forward.

Beth or Chuck, please include anything I may have missed here.

Mike and Lindsey please provide a couple of times and dates that will work for you to meet and determine the best approach to move forward.

Esquivel, Joan

From: Hernandez, Reynaldo
Sent: Tuesday, December 12, 2017 5:43 PM
To: Lesniak, Chuck; Robinson, Elizabeth [Beth]; Vaclavik, Charles; Arnold, Tony [PARD]; Linseisen, Andrew
Cc: Kallivoka, Liana [PARD]
Subject: Stratford Lane - C3 Improvements
Attachments: memo_Stratford Lane 12-12-2017.doc

All,

Attached is a draft memo to be addressed to C3 regarding the proposed improvements just north of Stratford Lane. Recall, that C3 is utilizing the existing landfill cap for the purposes of parking and staging for the various events held at Zilker Park. PARD, WPD and DSD has been working diligently with C3 to achieve removal of the existing gravel with code and regulatory compliant surface coverage for well over a year. The purpose of the memo is to request compliance of C3 on the agreement reached by all parties to have the existing gravel removed by end of January 2018.

Please review and provide edits as necessary.

Thanks

Rey

Reynaldo Hernandez Jr, PLA
Parks and Recreation Department PARK DEVELOPMENT
919 W. 28 ½ Street, Austin Texas 78705
512-974-9464



MEMORANDUM

TO:

FROM: Kimberly McNeeley, Interim Director
Austin Parks and Recreation Department

DATE:

SUBJECT: Stratford Lane: Parking and Staging Area Improvements

The Austin Parks and Recreation Department (PAR) has been working closely with C3 Events (C3) to address the concerns and requirements expressed by the City of Austin Watershed Protection Department (WPD) in the coordination and execution of designing and implementing a 'cap' to the existing landfill plot adjacent to Stratford Lane at Zilker Park. The current condition exists based on needs identified by C3 for use of this area as staging and parking for numerous Zilker Park events such as Austin City Limits.

In the summer of 2016, C3 placed 'gravel' above the existing landfill cap without meeting City of Austin and State of Texas codes and regulations inclusive of required permits. In mid-January of 2017, representatives of PAR, WPD and the Development Services Department (DSD) met with C3 to offer support and advice on identifying key issues and design considerations for the replacement of the gravel over the landfill cap with the general understanding that the existent gravel would be removed from this area prior to Austin City Limit festival held in September of 2017. The condition and material of the existing 'cap' does not meet with regulations and codes of the City of Austin and Texas Commission on Environmental Quality (TCEQ) of the State of Texas for intended uses. Issues and concerns related to drainage and water quality need to be addressed in order for utilization as parking and or 'staging' area. PAR and WPD have diligently and closely collaborated with C3 to outline the project schedule inclusive of completing a design that addresses city and state code compliance, permitting timeframe and a construction timeline. PAR and WPD provided dedicated staff in assisting C3 to meet the project goals and schedule including the engagement of the DSD to directly assist C3 in completing the project within the established and agreed upon schedule. To assist C3 on the complexities of the project, early in 2017, WPD and PAR provided an extension on removing the gravel till January of 2018.

As of December 1, 2017, C3 and project consultants, have not completed all of the required phases to receive a Site Development Permit (SDP) through DSD. The required SDP would allow for removal of the existent gravel and re-vegetation of site inclusive of water quality improvements and compliance with Texas Commission on Environmental Quality (TCEQ) codes and regulations that apply and as agreed upon by C3. PAR, WPD and DSD do acknowledge the complexity of issues and constraints that have been encountered and addressed by C3 throughout the project development. At this time,

however, the current project schedule outlines that the submittal of the Completeness Check to DSD occurred on November 27, 2017. (See attachment). Response from DSD on the Completeness Check is anticipated to be received on December 11, 2017. The current schedule received from C3 also indicates that the SDP will be achieved in late April of 2018. The anticipated construction time frame is estimated at just under four (4) months after bidding and contract award. Based on this schedule construction of improvements will primarily take place between June and September of 2018.

Based upon the current status of the design, permitting and projected construction time frame, PARD is requesting that C3 comply with the original agreement. The agreement establishes removal of the gravel from the landfill site per specifications which include re-grading and re-vegetation of the site. Care must be taken during removal to minimize damage to the landfill cap and winter seed mix and temporary irrigation will need to be installed to revegetate this area. PARD would allow for storage of the removed gravel at a location west of Mopac in the PARD stockpile area for potential reuse at a later date. PARD is requesting that this work be completed by the next major event at Zilker Park which has been identified as the Austin Kite Festival held in mid-March.

It is the intent of PARD, WPD and DSD to continue supporting C3 in completing the process of obtaining the SDP to replace the existing gravel cap. This will ensure that the area is compliant with current City of Austin and TCEQ codes and regulations. In the interim, PARD and WPD will also continue to provide staff support to C3 per the original intent of the agreement.

If you should have any questions please contact me at 512-974-9464.

Cc: Liana Kallivoka PHD, Assistant Director, Parks and Recreation Department
Chuck Lesniak, Watershed Protection Department
Andre Linseisen, Assistant Director, Development Services Department
Elizabeth Robinson, Managing Engineer, Development Services Department
Tony Arnold, Project Manager, PARD

EXHIBIT 3

**COMPARISON OF REGULATORY REQUIREMENTS
FOR BUTLER LANDFILL AND POLO FIELDS**

COMPARISON OF REGULATORY AREAS

	Code Definition	Polo Field	Butler Landfill
Zilker Primary Waterfront Setback Area	25-2-745(B)	no	yes
Zilker Secondary Waterfront Setback Area	25-2-745(C)	no	yes
Critical Water Quality Zone	25-8-92	no	yes
Water Quality Transition Zone	25-8-93	no	no
Water Supply Suburban Regulatory Area	25-8-2(D)(10)	yes	yes
Edwards Aquifer Recharge Zone	25-8-2(D)(5)	yes	yes
Recharge Verification Zone	25-8-2(C)	yes	yes
Barton Creek Watershed (see note A)	25-8-2(D)(2)	no	no
Lady Bird Lake Watershed (see note B)	not defined	yes	yes
Eanes Creek Watershed	not defined	yes	no
Barton Springs Zone Regulatory Area (see note C)	25-8-2(D)(1)	yes?	no?
TCEQ Closed Municipal Solid Waste Landfills	30 TAC 330.951-964	no	yes

Note A: The Barton Creek Watershed as shown on City GIS maps technically conflicts with the definition in the code. The definition in the code defines the watershed as "the land area that drains to Barton Creek." The code does not exclude the portion of the watershed that drains to the Barton Creek Arm of Lady Bird Lake. However, a rational argument can be made that the Barton Creek Arm of Lady Bird Lake is really a part of the Lady Bird Lake watershed rather than the Barton Creek Watershed. The City GIS maps do include a portion of the Barton Creek Arm of Lady Bird Lake in the Lady Bird Lake Watershed, but unfortunately, the City GIS maps do not include all of the Barton Creek Arm of Lady Bird Lake in the Lady Bird Lake Watershed. Instead, the City GIS maps place the lower portion of the Barton Creek Arm of Lady Bird Lake in the Lady Bird Lake Watershed and the upper portion of the Barton Creek Arm of Lady Bird Lake in the Barton Creek Watershed. According to Chris Herrington in WPD, this watershed dividing line "was selected historically to be located at the confluence of the Old Mill Springs outfall and Barton Creek as being representative of the last major discharge point of the Barton Springs Segment of the Edwards Aquifer." However, this definition of the dividing line is arbitrary, is not defined in the City code, and has no technical justification from a surface watershed standpoint. The Barton Creek Watershed as used in this table is based on the main Barton Springs Dam as being the dividing line between the Barton Creek Watershed and the Lady Bird Lake Watershed.

Note B: Although the code does not specifically define the Lady Bird Lake Watershed, the normal pool elevation of Lady Bird Lake is 828.6 feet. The watershed should include all areas draining into the lake at this elevation including the tributary arms of Lady Bird Lake. The Barton Creek Arm of Lady Bird Lake extends up to the downstream face of the main (lower) Barton Springs Pool dam, based on the City of Austin 2012 2-foot contour elevation lines and Sheet 7 of Site Plan for Barton Springs Pool Phase I (SPL-SPC-99-0028C).

Note C: The Barton Springs Zone is defined as "the Barton Creek Watershed and all watersheds that contribute recharge to Barton Springs." The surface runoff from the Polo Field does not flow to Barton Springs. Rather, it flows to the Barton Creek Arm of Lady Bird Lake below the Barton Springs Pool. Although City GIS maps show a portion of the Polo Field to be in the Barton Springs Zone, the Polo Field is only in the Barton Springs Zone if one believes that the groundwater underneath the Polo Field contributes recharge to Barton Springs and does not flow instead toward Lady Bird Lake. There were no scientific studies located which demonstrate that the groundwater in this area recharges to Barton Springs. Conversely, if some of the groundwater below the Butler Landfill recharges to Barton Springs, it would be considered to be in the Barton Springs Zone.