	I-35 Capital Express Central - City of Austin Comments						
Comment #	Document	Page / Section	Agency/Department	Comment			
1	Draft Purpose and Need	Page 3, Section 2.1 Design Standards	Department (ATD)	ATD has concerns about the design standards (Design standards, Page 3, Section 2.1 Design Standards). The study indicates that there is a need to address design standards because the current freeway does not meet AASHTO 2018 or TMUTCD 2011 Guidelines. While this is true, the Statement of Need should acknowledge that the facility is in an extremely constrained urban corridor, and as such should be designed according to the context this environment provides using alternative context sensitive design standards as allowed under both the AASHTO and TMUTCD Standards. Maximum effort should be afforded to avoiding, minimizing, and mitigating impacts to the natural and urban built environment. Insert the following language: The Austin Strategic Mobility Plan identifies multiple policies the should guide the design of this constrained urban corridor to avoid, minimize, and mitigate impacts to the natural and urban built environment. These include: Roadway System Policy 5, "manage right of way space for all users," Land and Ecology Policy 1 "avoid, minimize and mitigate adverse impacts of the transportation network on natural and cultural resources," and Land and Ecology Policy 2 "pursue designs that enhance our ecosystem."			
2	Draft Purpose and Need	Section 3	Department (ATD)	ATD has concerns that Section 3 is too brief and does not cover all of the project's purpose. To more accurately capture the project's purpose please insert the following thoughts: -insert "local" between "critical" and "regional" -I-35 occupies a lot of area in dense urban space. The highway's design must acknowledge the limited space and multiple neighborhoods, uses, and modes that immediately surround the project, especially in Downtown Austin. The design of the project should support Austin Strategic Mobility Plan Land Use Policy 3 "create places that encourage travel choice and are connected." The Austin Strategic Mobility Plan notes that the role of the transportation network is to "do more than just facilitate travel from one place to another," and that any "regulation and redesign" of our transportation network" must consider how communities interact with the transportation network. The design should also adhere to Austin Strategic Mobility Plan Land Use Policy 5 "make streets great places."			
3	Draft Purpose and Need		CoA-Austin Transportation Department (ATD)	It is critical that the need for the project includes how the north-south connections provided by I-35 affect the lack of east-west connections in Austin. The Austin Strategic Mobility Plan recognizes the importance of east-west connectivity in addition to the north-south cornidor in the region, I-35 not only affects north-south travel, but also east-west travel. The Austin Strategic Mobility Plan explicitly notes that due to the construction and design of I-35 "those traveling east/west [are] without adequate connections." Travel demand to cross I-35 will continue to exist due to land use and housing capacity limitations within the city of Austin and Travis County. Including these connections will support Roadway Policy 1 of the Austin Strategic Mobility Plan, which aims to "identify and develop projects that, while helping meet our mode share goals, increase vehicle capacity on our roadway system at strategic locations to manage congestion and facilitate emergency response, across a range of travel directions and distances, and prioritize connectivity of our streets for the common public good." East-west connections are especially important where I-35 interacts with our Vehicle, Transit, and Bicycle Priority Networks. In Capital Express Central, the Vehicle Priority Network intersects with or crosses I-35 at 51st 5t, 45th 5t, 38th 5t, MLK Jr. Blvd, 15th 5t, 11th 5t, 8th 5t, 7th 5t, 6th 5t, 5th 5t, Cesar Chavez 5t, Riverside Dr, Oltorf 5t, Ben White Blvd, as I-35 is adjacent to the terminus of Cameron Rd. "Complete the Bicycle Priority Network" is Bicycle System Policy 2 in the Austin Strategic Mobility Plan. Lane, 51st 5t, 10th 5t, 6th 5t, 5th 5t, 4th 5t, Ath 5t			
4	Draft Purpose and Need	Section 2.2	CoA-Austin Transportation Department (ATD)	ATD believes the need for the project should be reframed to emphasize the carrying capacity of the roadway and reflect City of Austin policy. Rephrase Section 2.2 to note that the issue with flow and operations should focus on how to most efficiently move people and goods, as opposed to future travel demand or growth projections. Stating the need in terms of only vehicle congestion and vehicle travel times prematurely eliminates viable alternatives and skews the outcome of the NEPA process. Focusing on moving people and goods efficiently and increasing the person-carrying capacity of the highway aligns with the Austin Strategic Mobility Plan's Roadway System Policy 2: "increase the person-carrying capacity of the highway system," as well as Goods Movement Policies 1 and 2 "support reliable freight operations and efficient goods movement through, into, and out of Austin" and "recognize, plan for, and mitigate impacts of goods movement." Highway improvements that carry more people through managed capacity, and well as improved accommodations for bicyclists, pedestrians, and other users will maximize the number of people and goods that are able to flow through the corridor.			

Comment #	Document	Page / Section	Agency/Department	Comment
1 5	Draft Purpose and Need	All	CoA-Austin Transportation Department (ATD)	ATD wants to see safety for all users prioritized in the purpose and need for the project. The draft Purpose and Need makes only brief mention of the need to improve safety. This is in stark contrast to the detailed description and analysis of congestion, travel times, etc. on the corridor. The City requests that the Need be updated to explicitly describe the need for the redesign to improve safety for all users. The Purpose and Need should include crash statistics on the corridor. This can be accomplished by adding an additional subsection in Section 2, 2.4 Safety. Include the following information: Between 10/1/15 and 10/1/20 there were over 5,300 reported crashes on I-35 mainlanes from US 290 East to US 290 West/SH71 (source: CRIS). These crashes resulted in the loss of 19 lives, as well as 56 serious injuries and over 1,300 non-incapacitating injuries. The Texas Transportation Commission set the goal of zero traffic fatalities on Texas roads by 2050, and to cut fatal crashes in half by 2035. Similarly, the CAMPO 2045 RTP sets the following goals 1) Reduce severity and number of crashes for all modes, and 2) Support local government and transit agencies reaching vision zero metrics.
				The City of Austin has also adopted a Vision Zero goal, and the Austin Strategic Mobility Plan contains multiple policies regarding safety on the transportation network, including on highways. It is City policy to "prioritize the protection of human life over all else in the planning, design, and operation of Austin's transportation network," which includes I-35 (ASMP Safety Culture Policy 1). Retrofitting I-35 should also "minimize the potential for conflicts between transportation network users," which is another adopted policy and is critical for an urban highway such as I-35 (ASMP Designing for Safety Policy 2). The City of Austin has also adopted a policy to "minimize the safety risks of highways" in order to "ensure that safety, particularly for vulnerable street users, is the primary consideration in new construction projects and retrofits of high-speed, access-controlled roadways within Austin" (ASMP Designing for Safety Policy 5).
6	Draft Purpose and Need	Section 2.2, Subsection 2.2.1	CoA-Austin Transportation Department (ATD)	ATD has concerns about the accuracy of the travel demand models. Travel Demand: Section 2.2, Subsection 2.2.1, Figure 1: During the Environmental Linkages Study for this corridor and in prior planning studies conducted by TXDOT, the projection of traffic growth has consistently been questioned. During the Environmental Linkages Public Meetings and in Agency Discussions, TXDOT's representatives indicated that they were counting on significant TDM (Transportation Demand Management) to reduce future demand so that the measures of service and effectiveness of the various alternatives could be better demonstrated. As a result of COVID, we have seen a 20% on average reduction in travel demand, especially during the peak commute periods, with many employers indicating that they will commit long-term to teleworking and alternative travel modes. Likewise, the City of Austin with Capital Metro is making a major investment in transit that will continue the progression to a less car-centric commute. Insert a sentence into this section that states "TDM strategies will be a significant part of this project, and supporting their implementation will align with the Austin Strategic Mobility Plan Transportation Demand Management Policy 1, which is to "implement community-wide strategies to increase use of all transportation options and manage congestion."
/	Draft Purpose and Need	6	COA-Austin Transportation	The City of Austin's Vision Zero goal states that there should be zero annual vehicular-related deaths and serious injuries within Austin city limits. TxDOT reported that in 2019, there were 35 pedestrians killed on Austin roadways. Fourteen of those killed were on I-35. A key factor in deadly crashes is vehicular speed. If a car is traveling above 55 miles per hour, it is 90 percent likely to kill a person in a crash. The desire to increase the speed of travel on I-35 frontage roads is incompatible with the goals of Vision Zero. Therefore, safety needs to be redefined and prioritized as a purpose for this project, in alignment with Austin Strategic Mobility Plan's Designing for Safety Policy 1, which states we must "manage for safe speeds" to "reduce the likelihood that crashes will result in a fatality or serious injury."
1 8	Draft Purpose and Need		CoA-Austin Transportation	The Austin Strategic Mobility Plan emphasizes the importance of moving goods and freight efficiently. This includes the need to "manage the movement of oversize and overweight vehicles" (ASMP Transportation Operation Policy 6) and "improve the safety and predictability of hazardous materials movement through Austin" (Austin Strategic Mobility Plan Goods Movement Policy 2). The Purpose and Need must take into account safe and efficient freight movement, but the range of build alternatives should acknowledge that the locally preferred State of Texas-mandated Non-radioactive Hazardous Materials Route does not include I-35.
1 9	Draft Purpose and Need	Page 3, Section 2.1 Design Standards	CoA-Austin Transportation	Design standards, Page 3, Section 2.1 Design Standards - The statement of need conjectures that the design of the current roadway causes delay and reduced flow - this statement is offered without proof and should be demonstrated with detailed traffic analysis. Furthermore, operations on IH 35 have a profound negative impact on the operation of surface streets, especially in downtown Austin. Ramping onto the IH 35 corridor creates operational gridlock and circular congestion, completely blocking grid operations because the primary facility (IH 35) cannot load and unload traffic efficiently. If the circular congestion in downtown during the PM Peak period cannot be adequately addressed with modified ramping and advanced operations on IH 35, then the project will not meet a primary goal as identified in numerous studies and planning projects leading up to the NEPA process. Insert the following language in either of the existing subsections of Section 2.1 or in a new subsection: The congestion currently experienced in downtown Austin is indicative of a need for the implementation of advanced operational concepts as part of the IH 35 replacement project. The Austin Strategic Mobility Plan has several adopted policies that relate to this need. Roadway System Policy 2 is "improve travel time reliability," and Transportation Operations Policies 1 and 4 are "operate the transportation network safely, reliably, and efficiently" and "strive for connected operations across departments, agencies, and jurisdictions." Operations on IH 35 have a profound negative impact on the operation of surface streets, especially in downtown Austin. Ramping onto the IH 35 corridor creates operational gridlock and circular congestion, completely blocking grid operations because the primary facility (IH 35) cannot load and unload traffic efficiently. Modified ramping and advanced operations on IH 35 will be necessary to adhere to the City policies stated above, as well as to meet a primary goal as identified in numerous studies and planning

Comment #	Document	Page / Section	Agency/Department	Comment
10	Draft Purpose and Need		CoA-Austin Transportation Department (ATD)	Please consider including proactive advanced work zone and traveler information integrated with real-time wayfinding to the construction plans. In addition to the plans and construction sequencing for this project, the region will be under construction on several other large scale projects/programs. These include Capital Metro's Project Connect, 2018 and 2020 City of Austin Mobility Bonds, etc. All project combined, the construction sequencing presents a unique mobility challenge in that most of the typical alternative routes will also likely be in some phase of construction. Additionally, this 'perfect storm' effect will further exacerbate roadway construction work zone related safety impacts such as work zone congestion and back-of-queue safety concerns.
11	Draft Purpose and Need		CoA-Austin Transportation Department (ATD)	The Department should take into consideration adding a base level of enabling infrastructure for Advanced Traffic Operations, Intelligent Transportation Systems, and Connected Vehicle Operations. Specific to Advance Traffic Operations, additional data and decision support systems are required to enable roadway operations, traffic incident management, and other essential roadway operations services, such as the HERO Program to meet the mobility needs during and after successful completion of this project. Specific to Intelligent Transportation Systems (ITS), considerations should be in place to integrate into the designs the needed supporting infrastructure for ITS, such as fiber optic communications conduit, ITS locations and other infrastructure per the Austin District's ITS Master Plan. Specific to Connected Vehicle Operations, this project is a part of the Texas Connected Freight Corridor and use cases and other base knowledge continue to be developed by TxDOT to support this consideration.
				ATD wants previous research related to the safety of this roadway included in the project record. Please submit for inclusion in the project record the 2017 FHWA Road Safety Audit of IH-35 between 51st Street and St. Johns Avenue.
12	Draft Purpose and Need	All	Department (ATD)	Summary: In March 2017 the Federal Highway Administration (FHWA) Resource Center lead a pedestrian-focused Road Safety Audit (RSA) of I-35 between 51st Street and St. Johns Avenue to help identify strategies that might reduce the occurrence of pedestrian-involved crashes (there were 10 pedestrian fatalities along this stretch of highway between 2007-2016). The RSA team, which included staff from FHWA, TxDOT Austin District, Austin Transportation Department and others, developed a number of short- and long-term recommendations to improve the pedestrian environment and discourage unsafe crossings.
13	Draft Purpose and Need	Section 2.3	CoA-Austin Transportation	Section 2.3 Bicycle and pedestrian safety should be revised to address the distinct needs to cross I-35 and to travel along I-35. Ensuring that there is safe and accessible bicycle and pedestrian infrastructure would support multiple Austin Strategic Mobility Plan policies, including Sidewalk System Policy 1 "complete the sidewalk system." Sidewalk System Policy 2 "make the sidewalk system accessible and comfortable for all," and Bicycle Policy 1 "make streets safe for bicycling." The first paragraph should include the need for safe accommodations to cross I-35 via the existing bridge locations and proposed future locations. Because I-35 is a major barrier within the bicycle system this change would also align with Austin Strategic Mobility Plan in Bicycle System Policy 3 "remove significant infrastructure gaps in the bicycle system," which aims to "ensure connectivity in the bicycle system and resolve geographic and infrastructure barriers to cycling." The second paragraph should cover the need for improved bicycle and pedestrian facilities along IH 35 frontage roads, which is currently not sufficiently described. Add the following language: In
				addition to improving design for the cross streets, the City has also designated the frontage roads along I-35 to also have safe bicycle and pedestrian accommodation. These paths would align with multiple adopted City of Austin policies in the Austin Strategic Mobility Plan. Providing these north/south connections would help the City achieve Bicycle System Policy 2 "complete the Bicycle Priority Network," and Bicycle Policy 5 also works to "develop a regional bicycle system." An updated design is necessary to support and achieve these policies.
14	Draft Purpose and Need	7	COA-Austin Transportation Department (ATD) & Housing and Planning Department (HPD)	"I-35 from US 290 East to US 290 West/SH 71 has reduced mobility during a majority of the day demonstrating the need to increase capacity." The Purpose and Need Technical Report assume that the only way to achieve improved mobility is through additional vehicular capacity. The project should evaluate at least one scenario that achieves increased capacity through other modes, not exclusively through increased vehicular traffic.
15	Draft Purpose and Need	Section 2.3	CoA-Austin Transportation Department (ATD)	ATD wants to see the need for pedestrian and bicycle crossings reflected in Section 2.3. Two of TxDOT's stated goals for the Mobility35 project are "improve east/west connectivity" and "improve compatibility with neighborhoods." Since at least the 2012 IH 35 design charrette and again at the 2020 design charrettes (North, Central, and South), ATD stressed that to achieve these goals, additional pedestrian and bicycle crossing locations to reduce the long distances are extremely important. It is also ATD's opinion that these new crossings are important to reconnect neighborhoods that were divided by the original IH 35 project and to address the equity of requiring long distance travel to cover short direct distances, particularly for those in our community who cannot afford motor vehicles. ATD's IH 35 memo to TxDOT in January 2020 provided locations where additional crossings would be best placed to serve these purposes and most feasible from a right of way and constructability perspective.
16	Draft Purpose and Need	Pg.5	· ·	ATD has concerns about the accuracy of Table 2 in the Draft Purpose and Need. Table 2 "Projected Percent Change" column is incorrect. Texas projection should be 57.3%, Travis County should be 56.6%, COA should be 46.2%
17	Draft Purpose and Need	All		Consider the land use visions developed in the neighborhood plans adjacent to the interstate and within the project boundary: East Cesar Chavez, Central East Austin, Upper Boggy Creek, Hancock, North Loop, Windsor Park, Riverside, South River City, Parker Lane, and St. Edwards.

Comment #	Document	Page / Section	Agency/Department	Comment
18	Draft Purpose and Need	6	COA-Housing and Planning Department (HPD)	Many businesses and community services abut or have direct access from the frontage roads. Assess the cumulative impacts of reducing the size of the street level ROW for maintaining and improving access to these businesses and adjacent neighborhoods. Please consider impact on local businesses currently located on frontage roads.
19	Draft Purpose and Need	All	COA-Housing and Planning Department (HPD)	There is a great deal of housing within walking distance of and along the I-35 corridor that includes many of the City's income-restricted units. Preservation of income-restricted units needs to be a top priority in project design and impact considerations. Noise pollution, air quality, safety, and all other quality of life impacts need to be analyzed and mitigated with the intent of reducing harm to these residents. The City has provided a map of income restricted units that can be used as a resource in the EIS (https://austin.maps.arcgis.com/apps/MapSeries/index.html?appid=b689c16a4db143698166b57a7abb876e).
20	Draft Purpose and Need	6	COA-Housing and Planning Department (HPD)	According to the FTC PEL, the benefits of increasing travel speeds and reducing travel times are limited to only the managed lanes (Table 5. AM Peak Corridor Mobility Screening Results and Table 6. PM Peak Corridor Mobility Screening Results). The messaging needs to be transparent that the purpose of reducing travel times will not be realistic for all travelers on the highway, especially when considering the reality of induced demand. Instead of reducing travel times, the focus should be on "operate[ing] the transportation network safely, reliably, and efficiently of the transportation network" (ASMP Transportation Operations Policy 1).
21	Draft Purpose and Need	All	COA-Housing and Planning Department (HPD)	Integrate the Imagine Austin Comprehensive Plan land use policies including LUT P2, LUT P3, LUT P5, LUT P7, LUT P11, LUT P15, LUT P26, LUT P29, LUT P33, LUT P36, and LUT P45.
22	Draft Purpose and Need	All	COA-Housing and Planning Department (HPD)	Consider the guidance illustrated in the Growth Concept Map of the Imagine Austin Comprehensive Plan, described on page 98 and page 103 in Figure 4.5 Growth Concept Map.
23	Draft Purpose and Need	All	COA-Housing and Planning Department (HPD)	Continue coordination with the City of Austin Housing and Planning department with on-going development of the Palm District Planning initiative.
24	Draft Purpose and Need	Section 3	CoA-Equity Office	Please ensure that the safety outcomes of the project do not have a disparate impact on people of color. ATD's Vision Zero Dashboard indicates that people of color are overrepresented as victims of serious injury crashes. This would align the project with the Austin Strategic Mobility Plan's Safety Culture Policy 1, Public Health Policy 1, and Designing for Safety Policy 5. A particular concern is the Austin Resource Center for the Homeless (ARCH), which is located two blocks from I-35. The ARCH is the city of Austin's main provider of a continuum of care for our community members experiencing homelessness. While our citywide Black population is under 8%, Black people experiencing homelessness in Austin represent at least 35% of homeless individuals in Austin. It is likely that the project could have significant safety implications for the population served by the ARCH. We request that this data be taken into account in the purpose and need for this project, which aligns with the City's adopted policy to "amplify the voices of historically underserved and underrepresented populations" (ASMP Equity Policy 2) and "prioritize serving the most vulnerable populations in Austin by supporting broader efforts to provide social services" (ASMP Equity Policy 5).
25	Draft Purpose and Need	All	CoA-Equity Office	The Draft Purpose and Need should include the need to mitigate the negative impact to environmental justice communities caused by I-35's upper decks and lack of at-grade local street crossings. This mitigation aligns with unanimously adopted local policy language in the Austin Strategic Mobility Plan, specifically Equity Policy 1 which states that we must "acknowledge and learn from the negative effects of past transportation and land use decisions."
26	Draft Purpose and Need	All	CoA-Equity Office	The Draft Purpose and Need should be revised to include that the project needs to minimize any additional right of way to avoid further direct displacement by eminent domain of both residents and their homes and small businesses, specifically those owned by people of color. Multiple expansions of I-35 main lanes and frontage roads throughout the twentieth century directly displaced communities of color in Austin through the use of eminent domain. That addition to the document would align with Affordability Policies 1 and 2 of the Austin Strategic Mobility Plan, which respectively state we must "proactively assess displacement impacts of transportation projects" and "work with communities to mitigate displacement impacts of transportation projects."
27	Draft Purpose and Need	p. 2 / intro	COA-Economic Development Department	Last paragraph should be the first and expand on 35's economic importance. Ex., IH35 is the critical component of the global supply chain through NAFTA. While values can't be ascertained for central Texas, trade between Canada, USA and Mexico is valued at \$144M per hour and 12M jobs. In 2018 Austin ranked 33rd with \$10.9B value of its exports and 32nd with number of export-related jobs at 74,000. The auto industry is growing in Texas which ranks sixth nationally in automotive manufacturing employment, and second in the value of its exports of transportation equipment. Tesla Gigafactory promises to bring additional 5,000 jobs to Austin.
28	Draft Purpose and Need	p.2 / 2.1.2 Need	COA-Economic Development Department	Intro paragraph should reference substantial revisions needed to address Austin's robust job and population growth; safety needs faced by multimodal users; create hazardous cargo route and to address social justice impacts from original design. Where also is a discussion that new design must capture evolution of transportation (electric cars/trucks, scooters, ridesharing, AV etc.) Demographics do not address the 'silver tsunami' coming Austin popular place to retire and downtown has many older residents.

Comment #	Document	Page / Section	Agency/Department	Comment
29	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	The City of Austin supports the continued study of the potential downtown collector-distributor circulator system with direct unsignalized access from City of Austin streets to general purpose and managed lanes. We believe this concept could mitigate the currently proposed reduction in ramp access to Central Austin for both general purpose and managed lanes and address chronic issues with the daily loading and unloading demands of Central Austin. It could also reduce the need for main lane-bound traffic to use the frontage roads and reduce the necessary number of additional frontage lanes. TxDOT should analyze traffic operation of this concept to determine if it would enable much smaller, safer, and calmer people-centric signalized surface streets with the bulk of the interstate-bound traffic capacity being handled by the circulator system, mitigating a key safety concern and aligning with downtown stakeholder interests. Analysis should include reversal of on- and off-ramp functions and locations; optimizing access to primary downtown streets of Dean Keeton Street, MLK Boulevard, 15th Street, 6th/7th Streets, and Cesar Chavez Street.
30	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	The segment of IH-35 near Dean Keeton Street and adjacent to the University of Texas (UT) and the Mt. Calvary Cemetery is a significant constraint because of TxDOT's limited existing right-of-way (ROW). If additional ROW is needed from UT on the west side of IH-35 to accommodate the future footprint of IH-35, and if UT is open to revisiting its Master Plan with respect to relocation of the football practice facilities currently adjacent to IH-35, then an opportunity is possible for the existing City-owned Red River Street between Clyde Littlefield Drive/Manor Road and Dean Keeton Street to be utilized as something other than a standard street as it is presently. The City would be willing to discuss this possibility of it results in a better project overall.
31	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	A pedestrian/bicycle bridge between 51st Street and US 290 is needed to address this existing pedestrian fatality hotspot. This could require the elevated managed lanes be elevated slightly higher at the location of the bridge to allow sufficient vertical clearance. Another alternative would have the elevated managed lanes meet ground level farther north and match the cross section to the south, allowing the pedestrian/bicycle bridge to pass over all vehicular lanes.
32	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	It is essential that concepts be explored in connecting the managed lanes that serve transit to planned transit facilities, including Riverside Drive and Dean Keeton Street. One example includes the elimination of the existing sweeping slip lanes and entrance ramps at Dean Keeton Street to result in a typical at-grade intersection with the IH-35 frontage roads. This could save costs and reuse excess space to achieve direct transit access from Dean Keeton Street to managed lanes to the north (serving UT demand), which is a strong interest from the City of Austin and Capital Metro. The Dean Keeton Street crossing should also account for future high-capacity transit operating in exclusive ROW as planned in Project Connect and the ASMP.
33	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	At the intersection of Airport Blvd and IH-35, the City would like to avoid concepts including a diverging diamond interchange, continuous flow intersection, and flyovers. A more traditional signalized intersection is more fitting for an urban environment where high pedestrian traffic is likely and would result in adherence to safe urban driving characteristics.
34	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	Preservation of transportation connections per the adopted Austin Bicycle Plan (https://austintexas.gov/page/austin-bicycle-plan) and Urban Trails Plan (https://www.austintexas.gov/urbantrails) is essential. Existing and proposed facilities should not be degraded or modified from these plans without coordination with the City of Austin. Of particular note is providing a high-quality improved connection between the IH-35 shared use paths and the Lady Bird Lake trails (Butler Hike and Bike Trail on the north shore and the Boardwalk on the south shore). These trail connections could be a valuable community asset of the signature bridge envisioned by TxDOT.
35	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	Frontage roads should be redesigned to urban boulevard standards for slower speeds and multi-modal facilitation given their function in the context of the downtown Austin environment. The National Transportation Safety Board (NTSB) concluded in its study at https://www.ntsb.gov/safety/safety-studies/Pages/SS1701.aspx that speeding is a primary contributing factor to fatalities and serious injuries. Countermeasures include context-sensitive design and lower speed limits. TxDOT should also follow the Federal Highway Administration's guidance on setting speed limits through safe systems at https://safety.fhwa.dot.gov/uslimits/ and TxDOT's own Procedures for Establishing Speed Zones at http://onlinemanuals.txdot.gov/txdotmanuals/szn/szn.pdf, which allow considerations other than prevailing speed to be considered when setting speed limits. NACTO provides guidance on frontage road design in the Urban Street Design Guide at https://nacto.org/publication/urban-street-design-guide/streets/boulevard/ and setting safe speed limits in City Limits at https://nacto.org/safespeeds/.
36	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	Lower target speeds of 30 mph should be incorporated between Dean Keeton Street and Holly Street on frontage roads. Signage on the mainlanes should allow for the slower speed limits on the adjacent frontage roads and adhere to TxDOT's speed step-down policies. Add design speeds for all facility types. Do the frontage roads have target speeds and designs to facilitate a more urban environment and accommodate conflicts generated by the driveways? Consider a speed gradient that support consistent yielding to pedestrians at corners and driveways.
37	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	How is the environmental impact of traffic disruption, namely diverted trips from IH-35 to City of Austin streets during construction, being measured and mitigated? Are staging areas along City of Austin streets being considered? If so, how are traffic impacts to and from these sites being measured and mitigated?
38	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	Modifications to street connections across IH-35 should be closely coordinated with the City of Austin. 5th Street is feasible new connection based on the proposed elevations of the IH-35 lanes. 4th Street and the Capital Metro railroad are important multi-modal connections that should be designed to improve safety while minimizing disruptions to operations. This includes evaluating grade separating the railroad and bicycle/pedestrian facilities from the frontage roads.

			1	
Comment #	Document	Page / Section	Agency/Department	Comment
39	Range of Alternatives Draft Technical report	Public Presentation		Provide safe crossing of pedestrians and bicyclists at signalized intersections along the frontage roads. Where a channelized right-turn lane is absolutely necessary for capacity, a "smart right" design should be used. TxDOT has developed its own guidelines for application through a research study with the University of Texas Center for Transportation Research at https://library.ctr.utexas.edu/Presto/content/Detail.aspx?ctID=UmVzZWFyY2gtaW4tUHJvZ3Jlc3NfMTExMjY=&rID=NzU=&ssid=c2NyZWVuSURfMTgxMTY. Raised pedestrian crossings should be incorporated to slow vehicle speeds and improve yielding compliance by drivers crossing paths with pedestrians and cyclists. All channelized right-turn lanes should be configured with yield control and no acceleration lanes to enter the frontage roads. City of Austin collaborated with TxDOT to fund, design, and construct raised crosswalks and/or reconfigured channelized right-turn lanes on TxDOT streets as safety improvements at Martin Luther King Jr. Blvd/IH-35 Frontage Roads and Lamar Blvd/Parmer Ln. These examples should be the template for signalized intersections along IH-35.
40	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	Will frontage road driveways be reconstructed? Is driveway consolidation being considered? What are the planned radii at these driveways? Radii will affect how the pedestrians and bicyclists maneuver along sidewalks and shared-use paths (SUP) at these driveways. The CTRMA 183 S project shared-use path is a good example of how large driveway radii can degrade an otherwise great shared use path. The City of Austin recommends having a standardized width, radius, and SUP setback for driveways to manage vehicle speeds, length of exposure, and crossing safety and comfort. Propose 15' radius, desired 10' setback (no less than 5') and a typical 24-30' throat width. Overly wide driveways should be tightened.
41	Range of Alternatives Draft Technical report	Public Presentation - Slide 22	CoA-Austin Transportation Department (ATD)	Please use an x-axis that is to-scale for the years 2018 through 2045. The way it appears now makes it look like the forecasted population growth is increasing at a greater rate than what has historically occurred from 1980 through 2018.
42	Range of Alternatives Draft Technical report		COA-Police Department	It is very difficult for APD to give truly informed feedback based on the limited information that we have on the project. We have seen artist renderings but there are no dimensions on the project, especially with height and width to the proposed roadways and tunnels. We were in agreement that we would like to stay away from tunnels if no other alternative can be made to achieve the safety and mobility purpose and need of the project. The tunnels are a potential barrier to public safety and first responder access to emergency scenes within them if not designed to the latest accepted safety standards, such as NFPA 502. Out of the proposed build alternatives, we like Build Alternative 2 the most, with the managed lanes lowered, as our first choice. This would eliminate any tunnels and allow easier access to emergency personnel. If the tunnel system is used there will need to be extensive unified training on responding to various incidents that could occur inside the tunnel(s). This training would need to commence prior to the tunnel system coming on line. Some of the issues that we forecast to happen are as follows: *What type of barriers will be used to separate northbound and southbound lanes, and the managed lanes from the main lanes? This will assist in helping us evaluate how or where we will be able to enter to access a crash event, and hopefully prevent some secondary crashes. *Will there be access points for emregency vehicles only to cross medians without having to exit and work back to a scene fighting traffic? *What type and where are the pedestrian crossings? For any of the three options there should be barriers to prevent pedestrian access to the main thoroughfare to stop the issues we currently see in pedestrian attempts to run across 135. *Accessibility to the roadways in the new project. If tunnels are built, how would emergency vehicles access a crash scene? Would there be emergency on or off ramps to get vehicles out of the tunnel? What would the shoulders of the roadway look like? Depending
43	Range of Alternatives Draft Technical report		Austin-Travis County Emergency Medical Services	Please ensure that the project will have shoulder access or width for the ability to manage accidents without being in the primary lanes of traffic.

Comment #	Document	Page / Section	Agency/Department	Comment
44	Range of Alternatives Draft Technical report		Austin-Travis County Emergency Medical Services	Please ensure access and egress from any tunnel or below ground roadway for patient access and removal.
45	Range of Alternatives Draft Technical report		CoA-Austin Fire Department (AFD)	Alternative 2 would be the first choice for Austin Fire Department as tunnels are problematic for many reasons
46	Range of Alternatives Draft Technical report		CoA-Austin Fire Department (AFD)	Elevated roadways also have many access and safety issues, and engineering should focus on access, ability to clear accidents and control fires.
47	Range of Alternatives Draft Technical report		CoA-Austin Fire Department (AFD)	If tunnels are used they need to meet NFPA 502. That is the standard that was used for the Mopac tunnels. The Mopac tunnels were very short, the proposed tunnels would be much longer. The requirements depend on the tunnel length. They could include fire resistance, fire protection, fire detection, adequate radio coverage, emergency egress, drainage, smoke removal and an emergency response plan. AFD also recommends limiting the types of vehicles and cargos that could use the tunnel. For example, limit Hazardous Cargo in the tunnels. Please use a fire protection Engineer in your design that is familiar with all of the systems, ratings and codes that keep everyone safe.
48	Range of Alternatives Draft Technical report		CoA-Austin Fire Department (AFD)	Turning radius, heights, lengths, widths and ground clearance of firefighting equipment and vehicles were recently provided to TxDOT design team for consideration and ensuring proper clearance. Please ensure that firefighting vehicles can access incidents on I-35.
49	Range of Alternatives Draft Technical report		CoA-Austin Fire Department (AFD)	Access during construction for AFD, as well as EMS and police, will be a continual concern, not only in the construction areas but also for east / west access as response vehicles constantly cross IH35.
50	Range of Alternatives Draft Technical report		COA-Public Works Department (PWD)	The City of Austin maintains a connected sidewalk network on both sides of the proposed Capital Expressway and relies on connections across the IH-35 corridor to ensure mobility options for people walking and to provide ADA-compliant routes. Please ensure that the design alternatives prioritize maintaining and improving existing sidewalk connections along and across the IH-35 corridor, which would align with adopted City policy including to "complete the sidewalk system" (ASMP Sidewalk System Policy 1) and "ensure sidewalks are safe and accessible for people with mobility impairment" (ASMP Accessibility Policy 3).
51	Range of Alternatives Draft Technical report		COA-Public Works Department (PWD)	The City of Austin Public Works Department maintains a critical Urban Trail that crosses the IH-35 corridor at E. 4th St. in Central Austin. Please ensure that the selected option maintains the ability for the Urban Trail to connect across the Capital Expressway at this location.
52	Range of Alternatives Draft Technical report		COA-Public Works Department (PWD)	The City of Austin Public Works Department and Parks and Recreation Department maintain pedestrian and bicycle trail facilities on both the north and south shores of Ladybird Lake, including the Butler Trail and Boardwalk. Please include the preservation and improvement of these facilities as a stated goal of the Capital Expressway.
53	Range of Alternatives Draft Technical report	Public Presentation	COA-Public Works Department (PWD)	The following seven proposed IH-35 crossings are called for in the Urban Trails Plan at https://www.austintexas.gov/urbantrails: Northern Walnut Creek Little Walnut Creek Bergstrom Spur Williamson Creek - South South Boggy Creek - Slaughter Creek - South Onion Creek - South The City of Austin requests space for a 12-foot trail to be added to bridge abutments, or if using a culvert design in the area, for the culverts to be designed in a way where one culvert is higher to accommodate a future trail passing through.

I-35 Capital Express Central - City of Austin Comments

Comment #	Document	Page / Section	Agency/Department	Comment
54	Range of Alternatives Draft Technical report	Public Presentation	COA-Public Works Department (PWD)	Because IH-35 acts as a physical barrier with regard to additions and improvements to utility networks, it would benefit the City and TxDOT for the project design to incorporate utility tunnels, duct banks, etc. reserved for municipal and franchised utility use, particularly with regard to dry utilities such as electric and telecoms. These would help facilitate future upgrades to the municipal network and minimize impacts. It is recommended that multiple east-west alignments be incorporated as well as north-south lines running just inside the east and west side TxDOT ROW.
55	Range of Alternatives Draft Technical report	Public Presentation	COA-Public Works Department (PWD)	The City of Austin Public Works Department has been a partner with TxDOT for maintenance of hardscape elements in the TxDOT right-of-way within the Austin city limits. Please ensure thatinfrastructure design elements are coordinated with the City of Austin Public Works Department, and that the department is involved in a review capacity, to ensure access and maintainability for infrastructure elements that may require maintenance by City forces.
56	Range of Alternatives Draft Technical report	Public Presentation	COA-Public Works Department (PWD)	The City of Austin Public Works Department has been a partner with TxDOT for clean-up and maintenance activities associated with people camping in TxDOT right-of-way within the City jurisdiction. There is an opportunity to utilize design strategies to mitigate camping near high traffic roadways along the Capital Expressway right-of-way. Please include a statement specifically addressing this topic and ensure that it is a focus of the final design(s) and that appropriate supportive housing are provided to support these vulnerable populations affected during and after construction.
57	Range of Alternatives Draft Technical report	Public Presentation Slide 20	CoA-Watershed Protection Department (WPD)	The City requests working with TxDOT to prevent adverse impacts to the project's receiving waters (Colorado River and its tributaries) in the form of increased flooding, erosion, and water pollution from stormwater runoff. See City of Austin adopted guiding plan: Watershed Protection Master Plan at: https://austintexas.gov/department/watershed-protection-master-plan and https://www.austintexas.gov/watershed_protection/publications/document.cfm?id=261630&id2=%20
58	Range of Alternatives Draft Technical report	Public Presentation Slide 20	CoA-Watershed Protection Department (WPD)	The City requests working with TxDOT to mitigate existing impacts from the current undetained and untreated stormwater runoff of the IH-35 system. See City of Austin adopted guiding plan: Watershed Protection Master Plan at: https://austintexas.gov/department/watershed-protection-master-plan and https://www.austintexas.gov/watershed_protection/publications/document.cfm?id=261630&id2=%20
59	Range of Alternatives Draft Technical report	Public Presentation Slide 20	CoA-Watershed Protection Department (WPD)	The City requests working with TXDOT maintain the integrity of the Waller Creek Tunnel, the drainage system contributing to the tunnel, and the Tax Increment Financing (TIF) Reinvestment Zone that the tunnel serves. See City of Austin adopted guiding plan: Waller Creek Corridor Framework Plan https://www.austintexas.gov/department/waller-creek-district-and-tunnel and http://www.austintexas.gov/edims/document.cfm?id=265606
60	Range of Alternatives Draft Technical report		CoA-Austin Energy (AE)	There is a potential Austin Energy conflict in Alternative 3 (Airport Blvd to MLK): if the highway would need to be widened and TXDOT acquires new ROW, many overhead poles would be impacted and in conflict and would need to be moved to new ROW. If any upper deck or flyovers needs to be added, Austin Energy has 5 overhead crossings in IH35 and below intersections, All of these overhead crossings are mounted on a maxed-out-height poles 85'-100' 38th ½ ST Concordia Ave E32nd St 30th ST Manor Rd Any modification to Austin Energy facilities should comply with Design Criterial Manual's clearances requirement.
61	Range of Alternatives Draft Technical report		CoA-Austin Energy (AE)	Alternative 1 (Airport Blvd to MLK) suggests a conflict with Austin Energy infrastructure: Austin Energy is all overhead in this area, and we have no underground facilities. Any modification to Austin Energy facilities should comply with the Design Criterial Manual's clearances requirements.

Comment #	Document	Page / Section	Agency/Department	Comment
62	Range of Alternatives Draft Technical report		CoA-Austin Energy (AE)	For the MLK to HWY 71 project scenarios there are 6 existing potential areas of conflict including: All Build Alternatives -Oltorf to SH 71: There is a potential conflict with South of Woodward overhead crossing & Oltorf overhead crossing — Span extends across IH-35 with poles on the east/west sides of the existing frontage road. There is a potential conflict if the proposed project extends beyond the existing frontage ROW or height of flyover ramp may be in conflict obuild Alternative 1 - MLK to Lady Bird Lake: There is a potential conflict with South of Lambie overhead crossing & 11th St. overhead crossing — Spans extend across IH-35 with poles on the east/west sides of the existing frontage ROW. 3rd St. underground crossing would be in conflict with lowered main lanes/NB managed lanes. There is the possibility to go overhead but sequencing will be a challenge. AE would need to be able to install overhead before removing underground and lowering main lanes. OBuild Alternative 1 - Lady Bird Lake to Oltorf: There is a potential conflict with Riverside overhead crossing & Oltorf overhead crossing — Span across IH-35 would be in conflict with proposed elevation of main lanes. There is the option to go underground may be limited by depth of two tunneled managed lanes. OBuild Alternative 2 - Airport to Oltorf: There is a potential conflict with South of Lambie overhead crossing, 11th St. overhead crossing, Riverside overhead crossing, & Oltorf overhead crossing would be in conflict with lowered main/managed lanes. There is the possibility to go overhead with 3rd St. crossing but sequencing will be a challenge. Austin Energy would need to be able to install overhead before removing underground and lowering main lanes. OBuild Alternative 3 - Managed lanes overpass at Woodland: There could be a conflict with Oltorf and Riverside overhead crossings depending on the transition to overpass. Any modification to AE facilities should comply with Design Criterial Manual's clearances requirement.
63	Range of Alternatives Draft Technical report		CoA-Austin Energy (AE)	East Avenue Duct Bank – the proposed duct bank alignment is approximately 6 feet FOC to centerline of the duct in the southbound frontage road from 12th to Lambie (estimated depth: 20'). Changes in the elevation/location of the frontage road could create a conflict. Any modification to AE facilities should comply with Design Criterial Manual's clearances requirement.
64	Range of Alternatives Draft Technical report			For the MLK to HWY 71 project scenarios there are potential areas of conflict including: All build alternatives -Oltorf to SH 71: Potential conflict with South of Woodward Overhead Crossing & Oltorf Overhead Crossing — Span extend across IH-35 with poles on the east/west sides of the existing frontage road. Potential conflict if the proposed project extends beyond the existing frontage ROW or height of flyover ramp may be in conflict. Any modification to AE facilities should comply with Design Criterial Manual's clearances requirement.
65	Range of Alternatives Draft Technical report		CoA-Austin Energy (AE)	For the MLK to HWY 71 project scenarios there are potential areas of conflict including: Build Alternative 1 - MLK to Lady Bird Lake: There is a potential conflict with South of Lambie overhead crossing & 11th St. overhead crossing – Spans extend across IH-35 with poles on the east/west sides of the existing frontage road. There is a potential conflict if the proposed project extends beyond the existing frontage ROW. 3rd St. underground crossing in conflict with lowered main lanes/NB managed lanes. There is the possibility to go overhead but sequencing will be a challenge. We would need to be able to install overhead before removing underground and lowering main lanes. Any modification to AE facilities should comply with Design Criterial Manual's clearances requirement.
66	Range of Alternatives Draft Technical report		CoA-Austin Energy (AF)	For the MLK to HWY 71 project scenarios there are potential areas of conflict including: Build Alternative 1 - Lady Bird Lake to Oltorf: Potential conflict with Riverside overhead Crossing and Oltorf overhead crossing – Span across IH-35 will be in conflict with proposed elevation of main lanes. Option to go underground may be limited by depth of two tunneled managed lanes. Any modification to AE facilities should comply with Design Criterial Manual's clearances requirement.
67	Range of Alternatives Draft Technical report			For the MLK to HWY 71 project scenarios there are potential areas of conflict including: Build Alternative 2 - Airport to Oltorf: There is a conflict with South of Lambie overhead crossing, 11th St. overhead crossing, Riverside overhead crossing, & Oltorf overhead crossing – Spans extend across IH-35 with poles on the east/west sides of the existing frontage road. Potential conflict if the proposed project extends beyond the existing frontage ROW. 3rd St. underground crossing is in conflict with lowered main/managed lanes. There is the possibility to go overhead with 3rd St. crossing but sequencing will be a challenge. Need to be able to install overhead before removing underground and lowering main lanes. Any modification to AE facilities should comply with Design Criterial Manual's clearances requirement.
68	Range of Alternatives Draft Technical report		CoA-Austin Energy (AE)	For the MLK to HWY 71 project scenarios there are potential areas of conflict including: Build Alternative 3 - Managed lanes overpass at Woodland: This could be a conflict with Oltorf and Riverside overhead crossings depending on the transition to overpass. Any modification to AE facilities should comply with Design Criterial Manual's clearances requirement.
69	Range of Alternatives Draft Technical report		CoA-Austin Energy (AE)	Austin Energy is concerned about impact of the project on two existing and one planned substation. TxDOT must continue to work with AE to protect the city's critical electrical infrastructure.

Comment #	Document	Page / Section	Agency/Department	Comment
70	Range of Alternatives Draft Technical report		CoA-Austin Water (AWU)	In general, the water line crossings are very critical either at a neighborhood level or on a regional water transmission level. The smaller crossings (24" & smaller) may be able to be replaced or relocated; however, there will be extensive waterline work parallel to IH35 to make this feasible. For the larger transmission waterlines, the most critical waterlines are: • 66" Transmission Main @ IH35 & 3rd St (Intersection #1004 & 1047) • 48" Transmission Main @ IH35 & Edgewood Ave (Intersection #1211) • 36" Transmission Main @ IH35 & 51st St (Intersection #7827 & 570) • 48" Transmission Main @ IH35 & Woodland Ave (Intersection #5297 & 3358) Relocating these larger water transmission mains will be difficult and will require extensive coordination between Austin Water and TxDOT. Please also note there are limitations to when and how long these transmission mains can be taken out of service. Any disruptions to these waterlines will need to be scheduled and carefully coordinated.
71	Range of Alternatives Draft Technical report		CoA-Austin Water (AWU)	Relocating or rerouting the wastewater lines will also be challenging. Critical wastewater pipes are extremely difficult or impossible to replace or relocate. These include the following segments: • Downtown Tunnel – 78" • Crosstown Tunnel – 96" • North Austin Interceptor – 48" • South Austin Interceptor – 54" There are other wastewater pipes (24" and larger) in the area I would classify as critical that could be relocated, but this would be challenging. The smaller crossings are also critical in that they provide wastewater service to existing customers. We would likely need to work with TxDOT to reroute and consolidate these crossings if they are in conflict.
72	Range of Alternatives Draft Technical report		COA - Parks and Recreation Department	The Parks and Recreation Department (PARD) has concerns about the project's potential impact on Sir Swante Palm Neighborhood Park: 1. Adjacency concerns - taking of parkland 2. Historic resource - Palm Park Shelter House is an eligible structure to be preserved and restored within the park redevelopment 3. Revitalization of Palm Park currently in design as part of the Waterloo Greenway project, in collaboration with Waterloo Greenway Conservancy 4. Sound concerns - additional noise pollution must be mitigated 5. Environmental concerns - polluted runoff flowing into parkland must be mitigated as current overland flow runs to Waller Creek 6. Adjacency provides a prime opportunity for east-west connectivity 7. Cesar Chavez crossing and Palm School should be considered in tandem with Palm Park
73	Range of Alternatives Draft Technical report		COA-Parks and Recreation Department	The Parks and Recreation Department (PARD) has concerns about the project's potential impact on Town Lake Metro Park North and South Bank North Bank: 1. Community Garden 2. East-West connection of Edward Rendon Sr. Park; bridge columns associated with the bridge expansion and impact on the parkland below South Bank: 1. Norwood House is a City of Austin Historic Landmark and requires careful consideration and sound mitigation 2. Southern parkland adjacency: sound mitigation, pedestrian connectivity to the boardwalk, multi-modal connectivity 3. future bridge columns and impact on the boardwalk
74	Range of Alternatives Draft Technical report		COA-Parks and Recreation Department	Town Lake Metropolitan Park at I-35—PARD manages parkland on the north and south banks of Lady Bird Lake at the juncture of the current I-35 bridge: The Ann and Roy Butler Hike and Bike Trail is a 10-mile loop around I-35. Through years of effort and a strong partnership with The Trail Foundation, connectivity beneath I-35 on the south shore was achieved through a \$28 million boardwalk. The trail's passage beneath I-35 on the north bank is ripe for major enhancement to improve multi-modal access and ensure greater accessibility. Centrally located waterfront parkland is a valuable and finite resource that provides opportunities for recreation, ecosystem services, and multi-modal access. PARD supports opportunities to eliminate or reduce any negative impacts to waterfront parkland.
75	Range of Alternatives Draft Technical report		COA - Parks and Recreation Department	The Parks and Recreation Department (PARD) has concerns about the project's potential impact on Oakwood Cemetery: It is a historic and cultural resource: established in 1839, the oldest municipal cemetery in Austin. a City of Austin Historic Landmark, and a Texas Historic Cemetery that is listed in the National Register of Historic Places.
76	Range of Alternatives Draft Technical report		COA - Parks and Recreation Department	Linear Parks & Trails along I-35: The Parks and Recreation Department (PARD) has concerns about potential impact on numerous critical east-west multi-purpose trail and greenspace connections. PARD has made major investments in acquiring parkland along major creeks for trail connections at the Northern Walnut Creek Greenbelt, Little Walnut Creek Greenbelt, Mueller Northwest Greenway, Williamson Creek Greenbelt, South Boggy Creek Greenbelt, Slaughter Creek Greenbelt, and Onion Creek Greenbelt.
77	Range of Alternatives Draft Technical report	4	COA-Housing and Planning Department (HPD)	HPD supports tunneling managed lanes. Alternative 1 proposes tunneling all 4 managed lanes only on the portion between Airport Blvd and MLK Jr. Blvd. The managed lanes should be tunneled, at a minimum, through the segment between MLK Jr. Blvd and Lady Bird Lake. This design will support a myriad of the project's goals such as wider managed and main lanes to promote better travel times for regional and international drivers passing through Austin without disrupting the fabric of downtown, increases options for transit and motorists traveling within the city, allows for more options in improving the ramp geometry, and promotes stitching that will connect communities on both sides of the interstate.

Comment #	Document	Page / Section	Agency/Department	Comment
78	Range of Alternatives Draft Technical report	All	COA-Housing and Planning Department (HPD)	HPD has concerns about the raised lanes in Alternative 3, but supports Alternative 2. The typical sections of Alternative 3 include raised managed lanes - although these don't exist the full extent of the project, they would perpetuate the physical barrier of existing raised lanes. Alternative 1 and 2 do not include raised lanes, but Alternative 2 offers the advantage of a simpler design (mostly at one grade) for nearly the entire extent of the project, meaning that any successful cap design could be more easily replicated in the future.
79	Range-of- Alternatives- Draft-Technical- Report	4	COA-Housing and Planning Department (HPD)	The third alternative creates an overpass over Airport which is in conflict with the agreed upon goal to remove the upper decks. This will continue to produce negative noise impacts and will not improve the aesthetic and visual quality of the area.
80	Range of Alternatives Draft Technical report	4	COA-Housing and Planning Department (HPD)	Which alternatives will require acquiring and clearing additional property? For each alternative, consider impacts of acquiring and clearing additional property as part of EIS analysis.
81		Environmental Constraints Map	COA-Housing and Planning Department (HPD)	HPD requests that TxDOT include previous research that is relevant to the project in the project record. Two additional historic resources surveys should be referenced in determining known historic properties along the Interstate-35 corridor. The East Austin Historic Survey (HHM & Associates, 2016) covers the area east of I-35 from Lady Bird Lake to Manor Road. The Historic Resources Survey of North Loop, Hancock, and Upper Boggy Creek (Cox McLain Environmental Consulting, 2020/2021) includes both sides of the interstate from E. Dean Keeton St. to the Mueller development, then continues on the west side to 2222. The results of the East Austin survey are available athttps://www.austintexas.gov/page/east-austin-historic-survey. The results of the North Loop, Hancock, and Upper Boggy Creek survey remain in draft form; the City of Austin Historic Preservation Office will provide draft results upon request, or once finalized, the results will be posted to https://www.austintexas.gov/page/current-projects.
82		Environmental Constraints Map	COA-Housing and Planning Department (HPD)	HPD requests that TxDOT reference locally designated historic districts. The Robertson/Stuart & Mair Historic District is within the area included on the Environmental Constraints Map. Please reference the Historic Property Viewer at https://austin.maps.arcgis.com/apps/webappviewer/index.html?id=5251cd8ad3534754ad9a3d6a222c68ec.
83	Alternatives Draft Technical	Capital-Express- Central-Typical- Sections	COA-Housing and Planning Department (HPD)	HPD has concerns about what is being proposed at Lady Bird Lake and the clarity of the graphics and text related to this area. It is difficult to understand from the sections provided what is being proposed at/above or below Lady Bird Lake. Please provide sections that will show the water level and illustrate the transition conditions where the land and water meet. In each Alternative it is stated that reconstruction/revisions will be made to the bridge over the lake but it is not clear what those are. In this and other provided documents there is little mention of studies/concern for the riparian areas and the natural and social systems that will be affected at the edges of the lake.
84	Range of Alternatives Draft Technical report	Public Presentation slides 35-40	COA-Housing and Planning Department (HPD)	HPD has concerns about the clarity of the drawings. It is difficult to differentiate between the Build Alternatives without close study and a passing familiarity with engineering sections. We suggest a bird's-eye view and "fly-through" simulation of each alternative to better help people understand what is being proposed.
85	Range of Alternatives Draft Technical report	AII	COA-Office of Sustainability	The Office of Sustainability has concerns regarding the I35 project in relation to the City's ability to meet City Council Strategic Direction 2023 goals and goals stated in the as well as goals of the Smart Mobility Roadmap, Watershed Protection Masterplan and the City's Climate Resilience Action Plan. The need for resilience to extreme weather events and changing climate conditions is now strikingly evident with ongoing and repeated events in Austin, such as extreme heat, drought, flooding, and wildfires. The Office of Sustainability asks TXDOT to conduct a vulnerability assessment of climate change impacts, infrastructure exposure and sensitivity to climate change, and how to incorporate climate change considerations into infrastructure project delivery, using the Central Texas Extreme Weather and Climate Change Vulnerability Assessment of Regional Transportation Infrastructure as a guideline for the assessment. As part of this effort, we ask TXDOT to conduct a Greenhouse Gas Emissions analysis and enact mitigation strategies. In order to reduce emissions associated with the use phase of the project, the Office of Sustainability requests for TXDOT to work with the Austin Energy Plug-In Everywhere Program and nonprofit TXetra to develop an Alternative Fuel Corridor Plan as part of the redevelopment - also See Texas River Cities Plug-In Infrastructure Plan for guidance. This comment is supported by the following city policies: *SD23: Health & Environment - Climate Change and Resilience HE.E.5a-5c. *SD23: Safety - Quality and Reliability of Critical Infrastructure S.E.2. and S.E.3 *SD23: Health & Environment - Climate Change and Resilience HE.E.1. and HE.E.3. *City Council Resolution No. 20131121-060, Response to Council *Climate Resilience Action Plan for City Assets and Operations. *City Council Resolution No. 20140410-024 *City Council Resolution 20170302-039 & Resolution-Al-2017-463 - Creation of a Smart Mobility Roadmap

Comment #	Document	Page / Section	Agency/Department	Comment
86	Range of Alternatives Draft Technical report	All	ISustainability	In order to align with City goals and policies TxDOT needs to assess and mitigate the emissions that might result from the construction phase of the project. TxDOT should conduct a vulnerability assessment that includes activities that create emissions include upstream emissions embodied in the materials used such as asphalt, concrete, and steel, maintenance activities, and traffic congestion. As part of this effort, we ask TXDOT to conduct a Greenhouse Gas Emissions analysis and enact mitigation strategies.
87	Range of Alternatives Draft Technical report	All	COA-Office of Sustainability	In order to reduce emissions associated with the use phase of the project, the Office of Sustainability requests for TXDOT to work with the Austin Energy Plug-In Everywhere Program and nonprofit TXetra to develop an Alternative Fuel Corridor Plan as part of the redevelopment - also See Texas River Cities Plug-In Infrastructure Plan for guidance.
88	Range of Alternatives Draft Technical report	All	COA-Office of	We ask that TXDOT work with the City to identify opportunities to integrate green infrastructure elements into the project planning and implementation. The I35 project provides a great opportunity to leverage local agencies to incorporate vegetation (native and pollinator habitat species) into the design and construction process and to utilize green infrastructure along the roadway to help address issues related to air quality, urban heat island, flooding, water quality and walkability. This would support the following city policies: •SD23: Health & Environment - HE.C.1. HE.C.5., HE.D.3. and HE.D.5. •Imagine Austin - Priority Program #4 Green Infrastructure •Austin's Urban Forest Plan
89	Range of Alternatives Draft Technical report	All	COA-Office of	Complete & Great Streets: The Office of Sustainability has concerns regarding the I35 project in relation to the City's ability to meet strategic goals of the Complete Streets program and the Austin Strategic Mobility Plan. The I35 project can enhance overall mobility by connecting East-West networks to help improve traffic flow and contribute to community livability. The City requests working with TXDOT to implement strategies that accommodate and support multi-modal transportation, including automobile, transit, and commercial vehicles while leveraging the Complete Streets policies that support active, healthy lifestyles. Policy/plan/strategic goal: • City Council Resolution No 20140612-119 - Adoption of the City Of Austin Complete Streets Policy. • City Council Resolution No 040205-14 - Great Streets Development Program. • Council adopted Austin Strategic Mobility Plan (ASMP) and voter approved 2020 Proposition B
90	Range of Alternatives Draft Technical report		Development Department	Ensure IH-35 plan and construction minimizes disruption to key Red River Cultural District (RRCD). This is supported by City policies: 1. City Adopted Comprehensive Plan Imagine Austin prioritizes mitigation from construction impacts for major infrastructure, especially public infrastructure development – this requires significant wayfinding and proactive promotion and, potentially, construction mitigation grants to help businesses respond to loss of access 2. Austin Strategic Mobility Plan Affordability Policy #2: Work with communities to mitigate displacement impacts [to housing and commercial affordability] of transportation projects (pg. 224) – strategy cites Twin Cities Central Corridor which offered businesses impacted by major construction "forgivable loans, tax help, and marketing support"
91	Range of Alternatives Draft Technical report		COA-Economic Development Department	Support ecological connections by incorporating tunnels or passages for wildlife
92	Draft Agency Coordination Plan	Table 1, pg. 7-11	CoA-Austin Transportation Department (ATD)	Please consider including more local stakeholders. Please add Huston-Tillotson University, St. Edward's University, Austin Community College, Central Health, Capital Area Council of Governments, Housing Authority of the City of Austin, and Capital Area Rural Transportation System, and Austin Independent School District as participating agencies due to geographic proximity, impact to provided services, and relationship to the local community.
93	Draft Agency Coordination Plan		CoA-Austin Transportation Department (ATD)	In accordance with City of Austin public outreach best practices, the City requests the following additions to your stakeholder outreach/public engagement plans: • Ensure that the project website is mobile friendly. • Ensure that information and surveys on the website and other sources are provided to the public in Spanish and all other languages commonly spoken in the area. • Ensure that translation services for Spanish and other commonly spoken languages are available at all public meetings. • Ensure that meetings and open houses will be held at a variety of times and days of the week to ensure maximum opportunities for different segments of the population. When possible, provide food, drink and, child care.
94	Draft Agency Coordination Plan	28-29	COA-Housing and Planning Department (HPD)	The Draft Coordination Plan should be revised to include a reference to "Construction impacts" and "Access during construction" to Neighbors & Neighborhoods, Pedestrians & Bicyclists, and Underserved/Underrepresented Populations.
95	Draft Agency Coordination Plan	All	COA-Housing and Planning Department (HPD)	Construction staging plans and maps should be included in the report as the activity of vehicles, equipment and materials could adversely affect environmental, social and market conditions throughout the study areas. Public or private land along the study that may be used for construction staging should be identified, evaluated and brought to the attention of the public for input.

Comment #	Document	Page / Section	Agency/Department	Comment
96	Draft Agency Coordination Plan	6	COA-Housing and Planning Department (HPD)	HPD wants to be sure that adjacent people in residential developments and neighborhoods are included as stakeholders. They should be listed in Key Audience "Neighbors & Neighborhoods" There are several apartment complexes along I-35. "Potential property acquisition, and displacement" should be added to this list. This should be explored directly, and indirectly, as there will be indirect effects.
97	Draft Agency Coordination Plan	1		HPD has concerns about how the unhoused population that seek shelter along I-35 will be included in the EIS analysis. Specifically, what are the impacts to the unhoused populations that seek temporary shelter along I-35? Of the 2020 Point-in-Time Count Results conducted by Travis County and ECHO, roughly 100 of the 1574 individuals were located along the I-35 corridor between US 290 East to SH 71/Ben White Boulevard.
98	Draft Agency Coordination Plan	3	COA-Housing and Planning Department (HPD)	The City requests a detailed analysis of households likely to be displaced by this project and potential mitigation strategies, including both how lower noise levels resulting from the removal of upper decks in all draft Build Alternatives will impact rent and housing prices along the corridor and how improved mobility/connectivity for bicycles and pedestrians will further increase the desirability of housing in neighborhoods along the corridor at high risk of displacement. Consider potential disproportionate impacts and take a serious look at mitigation for any additional or continuous harm to BIPOC-owned small businesses, adjacent residents, housing-vulnerable populations taking temporary shelter along the corridor, and all communities identified in the University of Texas' Uprooted report as being vulnerable to displacement. Doing so aligns with the City's adopted policy to "proactively assess displacement impacts of transportation projects" (ASMP Affordability Policy 1), as well as the recommendations of numerous taskforces and reports commissioned by the City over the last decade.
99	Draft Agency Coordination Plan	1		HPD has concerns about the amount of ROW acquisition that will be required for this project and how this acquisition will affect adjacent neighborhoods. Additionally, The draft Build Alternatives do not indicate the anticipated magnitude of right-of-way acquisition required, which will have varying levels of impact on commercial and residential displacement. This needs to be studied and brought back to the community for input and discussions about disproportionate impact and mitigation for all alternatives. If new ROW is to be acquired, each alternative should indicate how much ROW is needed and alternatives should be provided that include the option of maintaining and even reducing ROW widths. Questions that should be answered with the release of the alternatives include: What is the proposed ROW of each of the proposed alternatives? Which alternative requires the least amount of additional ROW? What are the access and acquisition impacts to residents and businesses? Will acquiring and clearing additional ROW create disproportionate impacts to marginalized groups and protected classes?
100	Draft Agency Coordination Plan	24-25,33	COA-Housing and Planning Department (HPD)	HPD has concerns about the use of demographic data in the development of the project. What are the ways you intend to "assess public involvement compared to overall demographics for the city and county"? We recommend you look at renter/ownership, race, ethnicity, income, geographic diversity. An equity approach would prioritize representation from communities of color most impacted by past harms and potential future harms. TxDOT should establish a goal for inclusive public involvement and commit to expand/diversify outreach methods if that benchmark isn't reached.
101	Draft Agency Coordination Plan	12		HPD has concerns about the range of build alternatives included in the project. The Project Milestones section lists "refine range of alternatives" with a Winter 2021 timeframe. However, the three released build alternatives were not designed with any public engagement and do not take into account all alternatives. This conflicts with the Austin Strategic Mobility Plan's Public Interaction Policy 2 "engage community members in transportation decisions." Expand the range of Build Alternatives to consider all viable alternatives in the EIS analysis based on scoping feedback.
102	Draft Agency Coordination Plan	3	COA-Housing and Planning Department (HPD)	HPD has concerns about the clarity of the project materials. Specifically, please add definitions for "environmental justice communities" and "aesthetic and visual resources."
103	Draft Agency Coordination Plan	29-33		HPD has concerns about public engagement and input on this project due to the limitations of the current public health circumstances. HPD requests that TxDOT establish and/or expand non-online outreach options.
104	Draft Agency Coordination Plan		COA-Housing and Planning Department (HPD)	HPD has concerns about who TxDOT considers stakeholders on this project because stakeholders is not defined in the project materials. Since I-35 is such a huge part of the transportation network, HPD believes that everyone in Austin can be considered a stakeholder and that every address should receive a mailed and emailed notification. Please add a definition of stakeholders.
105	Draft Agency Coordination Plan	33	COA-Housing and Planning Department (HPD)	Ensure that the text and graphics presented for public outreach can be easily understood by non-experts, non-planners, and non-native English speakers.
106	Draft Agency Coordination Plan		COA-Development Services Department (DSD)	DSD requests interdepartmental communication on any binding regulations that will require review and inspection by DSD, including providing data on anticipated staffing needs and time estimates.
107	Draft Agency Coordination Plan		COA-Economic Development Department	There needs to be a robust operational communications plan during the construction process. There needs to be a detailed, organized, well-communicated operations plan to mitigate disruption during construction. EDD strongly recommends that TxDOT collaborate with ATD, Capital Metro and major Downtown employers on formulating an operational plan as a communications "hub" that ensures seamless execution of that plan. An active "incident command center" throughout construction will ensure construction execution with minimal disruption of goods and services in and out of Downtown.