September 24, 2021

I-35 Capital Express Central Project
Attn: Project Team
7901 N. I-35
Austin, TX 78753

RE: Capital Express Program Comments (supplemented with additional signatory)

Thank you and the dedicated TxDOT Austin staff for advancing the work on the I-35 Capital Express Project. This project presents the potential to address what is one of our most pressing mobility, safety, and social equity challenges in Central Texas.

Even as we continue to work through our differences in opinion on critical design elements, we recognize the importance of the opportunity to bring back together two parts of Austin that for too long have been divided by the current I-35, restore Austin’s street grid, and create transit, bike, and pedestrian infrastructure that will facilitate the mode shift required to maximize the movement of people while minimizing greenhouse gas emissions.

In reviewing the alternatives released August 10th, we were heartened to see many design elements that would support this vision, including depressed main travel lanes, removal of the upper decks, a continuous shared-use path along both sides of the highway and wider crossings for our cyclists and pedestrians. However, concerns about the current alternatives remain, and there are additional elements we request be incorporated so we can offer our support and ensure we realize the full potential of this transformational project.

Building and Funding the Caps and Stitches as Part of the Larger I-35 Project

Construction of the highway caps and stitches over the depressed I-35 main travel lanes is essential to completing the vision of reconnecting our city and urban street grid. These elements should not be considered local enhancements that could be later added to the project, but critical elements incorporated into the design alternatives and included in project costing. For this project to fulfill its goal of connectivity, the caps need to be constructed at the same time as the highway, and the project costs should be borne by TxDOT.
Funding for the caps could come from the TxDOT-requested, CAMPO-deferred nearly one billion dollars in regional projects identified to make this project feasible at a time when other large Texas cities were unable to do the same for projects in their area. Those other cities have now received funding for similar projects and are able to use their regional dollars to fund additional improvements like highway caps. We should also have that same ability.

Additionally, as it appears the deeper-dig Alternative 1 is not going to be selected as originally considered, there appears to be a project savings of over a half a billion dollars that could now be applied to ensure the caps are constructed as part of this project.

**Optimizing Managed Lanes for Transit**

In meeting the long-term future needs of the Austin region, it is critically important that we improve transit access into central Austin, incentivizing the use of higher occupancy forms of transportation over the single-occupant vehicle. While present policies may prevent the initial project execution from employing variable tolling mechanisms at this time, it is imperative that TxDOT preserve the future ability to convert the managed lanes to toll lanes by designing them to function optimally as HOV/Toll or HOT lanes. Additionally, NEPA clearance should be completed in a way that calls out this future possibility so as to not require the need to repeat environmental work in the future to allow such a conversion. Clearly, all funding sources for this project must allow for such a future conversion.

Furthermore, access to and from the managed lanes must be designed in coordination with our transit system. If buses cannot efficiently use the managed lanes to move people among employment and residential centers, we have failed.

**Minimization of Footprint and Displacements**

The central portion of I-35 travels through the heart of an urban environment with little right of way to spare and calls for a unique design approach. We strongly support every effort to minimize the physical footprint along this corridor and ask TxDOT to look beyond its standard highway designs and consider all innovative alternatives. We request that you evaluate recommendations from the Austin Transportation Department, including greater use of cantilevering frontage roads, the utilization of ramp portals and collection and distribution systems, and the appropriate number of managed lanes to pass by the city core. We also request consideration of lower design speeds on both frontage road and mainlanes as a means to narrow the facility and increase safety for all users of I-35. Finally, we recommend that TxDOT actively engage with all stakeholders to discover what tradeoffs they might be willing to make for a narrower footprint design.

These efforts will minimize the amount of right away that needs to be acquired and limit the displacement of families and local businesses, which is of paramount concern to our community.
Increasing East-West Connectivity

In addition to the caps, we need to see additional east-west crossings created at regular intervals throughout the corridor, not just in downtown Austin. These crossings must ensure safe and convenient access across the highway for people walking, biking, rolling, and pushing strollers. Safe crossings alone are not sufficient if they are so far apart or so convoluted that people on foot cannot reasonably be expected to use them. Furthermore, to maximize safety and help reach TxDOT’s and the City of Austin’s shared goal of eliminating traffic deaths, as many of the east-west bike/ped crossings as possible should be fully separated from car traffic, such as the two currently proposed crossings adjacent to the Red Line. TxDOT should also coordinate with the Austin Transportation Department on both the design and location of bike/ped crossings, to ensure these connections are maximally useful to the community, leverage existing City of Austin investments (e.g. the Wilshire Boulevard and Manor Road bike infrastructure), avoid eliminating existing crossings (e.g. Clyde Littlefield Drive/Manor Road), and reflect modern best practices in active transportation design.

Use of Boulevard Concept and Creation of Safe, Inviting Spaces for All Users

The city is committed to its mode shift goal of a 50/50 split by 2039 between driving alone and all other modes of transportation, as established in our Austin Strategic Mobility Plan. We would like to see designs that draw and encourage these other modes of mobility by providing fast, consistent, safe, and comfortable passage.

We encourage extending the two-way frontage road "boulevard" concept shown between Manor Road and Dean Keeton Street to include all areas of Downtown and north central neighborhoods between Dean Keeton Street and 51st Street. As noted by the Texas Transportation Institute, the many benefits of a boulevard concept include reduced frontage road volumes, increased access between caps and adjacent land uses, shorter crossing distances, and improved signal efficiency.

We desire to see tree-lined Downtown and central neighborhood streets that are inviting to the public and provide safe, functional spaces for pedestrians and bicyclists of all ages and abilities. To accomplish this, we request that TxDOT ensure all frontage lanes have design speeds of 25 mph throughout the Central segment, design lanes to a maximum width of 11 feet, reduce or remove clear zone requirements, minimize curb radii and eliminate right-turn slip lanes to provide for safe crossings, and to incorporate street trees, planting areas, and seating opportunities between the curb and pedestrian pathways. To every extent possible, frontage
roads should behave as part of the local street network and support the City's Vision Zero goal, utilizing existing resources including the Austin Strategic Mobility Plan, Transportation Criteria Manual, and Subchapter E of the Land Development Code.

**Construction Considerations**

In November 2020, Austin voters approved the Project Connect Initial Investment transit system. The two new light rail lines included in Project Connect are planned to be in construction in Years 4-9, which roughly translates to 2024-2029. During this period, major Austin north-south and east-west arterials will experience significant and extended closures. Given that the I-35 Capital Express Central project is anticipated to begin construction in 2025 and last for many years, we ask that TxDOT conduct and provide modeling of the mobility impacts of the simultaneous construction of these two enormous projects, and we ask TxDOT to consider whether it may be prudent to delay construction on I-35 until the voter-approved, high-capacity rail lines are operational and available to relieve travel demand. By the time the Orange and Blue light rail lines are operational, Project Connect will have also built out three new regional MetroExpress routes, four new MetroRapid routes, nine new Park & Rides, and fifteen new neighborhood circulators, and expanded the regional Red Line commuter rail service, all of which could also substantially help accommodate travel demand while I-35 is under construction.

We acknowledge that community pressure is building against the project and that some of our City Commissions have already spoken in opposition to the present alternatives for the I-35 Capital Express Project. We have heard from over 1,600 Austinites that the current proposal falls short. We agree with the community that the current proposal does not meet the needs of our City. We need to see substantial changes to address these concerns in order to lend our support.

Please, work collaboratively with the City of Austin to respond to our requests for this generationally important project, and, to help alleviate the community’s transparency concerns, please allow City Council to have a representative at the table as you develop the Draft Environmental Impact Statement over the coming year. Consider all viable alternatives as part of the NEPA process. Design the future I-35 project to minimize real, negative impacts to our community. Configure the future I-35 project with long-term sustainable operations in mind, imbedding technologies and management techniques such as HOV/Toll management capabilities directly into the design that allow this project to be sustainable. Mitigate direct and indirect impacts suffered by our community by participating with the City in realizing the ability to reconnect east and west/central Austin, building both the superstructure necessary for caps, lids, and wide bridges and these important community elements themselves.
The I-35 Capital Express project is a once-in-a-community-lifetime opportunity to deliver a truly transformative solution to the current I-35 challenge. We know that this freeway is not only the main street for Central Texas, but it is the main street for the State. We want to work with regional and state leaders, including the Governor’s Office, the Transportation Commission, and TxDOT to make sure this is a project that all Texans can be proud of for generations to come.

Sincerely,

Steve Adler
Mayor

Natasha Harper-Madison
Mayor ProTem
City Council Member, District 1

Steven Fuentes
City Council Member, District 2

Greg Casar
City Council Member, District 4

Ann Kitchen
City Council Member, District 5

Leslie Pool
City Council Member, District 7

Paige Ellis
Chair, Mobility Committee
City Council Member, District 8

Kathie Tovo
City Council Member, District 9

Alison Alter
City Council Member, District 10

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