



Hand Delivered

City of Austin

City Manager's Office

Gina Flandaca, Assistant City Manager

P.O. Box 1088, Austin, TX 78767

(512) 974-2200, Fax (512) 974-2833

April 9, 2021

Mr. Tucker Ferguson
Austin District Engineer, and
Ms. Susan Fraser, Mobility35 Project Manager
Texas Department of Transportation
7901 N. IH 35
Austin, Texas 78753

Dear Mr. Ferguson:

Thank you for the opportunity once again to communicate on the I-35 replacement project. The City of Austin appreciates the staff at TxDOT Austin for leading the I-35 rebuild effort to address safety and mobility for our city, region, and state along this most important corridor.

The City of Austin confirms its support for the State effort to replace and modernize the existing I-35 corridor, reconstructing it as a more context-sensitive facility. We see this project as a multi-generational opportunity to improve the long-term mobility and safety of our region; an opportunity to rejoin people and places previously separated by the corridor; and an opportunity to benefit the economic, equity, and quality-of-life outcomes for the residents of Central Texas. We look forward to continuing our partnership in evaluating design elements that avoid, minimize, and appropriately mitigate environmental and community impacts.

As communicated in our prior scoping comments, the City's top mobility objectives for this project include:

- **Improve Safety** along and across the corridor for all users, including autos, bicycles, pedestrians, transit users, freight haulers, and for users of emerging technologies in accordance with Vision Zero principles.
- **Improve access to and mobility within key employment centers** such as the Capitol Complex and State employment centers, the University of Texas, East Side, and Austin's Central Business District.
- **Reconnect East and West Austin** by lowering the highway, constructing wide bridges and lids where possible, and acknowledging the role the existing I-35 facility played in reinforcing the racist land-use policies established by the City of Austin as part of our 1920's comprehensive plan.
- **Include operational engineering efficiency as part of the design process for the selected alternative**, by assuring that the facility design can accommodate the future operations management concepts proposed for the managed portion of the facility and by constructing the narrowest facility possible to meet the design requirements for managed lanes and access needs of our community.
- **Support and incorporate policies adopted by the City of Austin to decrease our City's dependency on the single-occupancy vehicle, improving the person-carrying capacity of the facility**, using tolled-managed lanes with preferential treatment for high-capacity bus transit modes where possible. Avoid and minimize impacts where possible, and appropriately mitigate those that are unavoidable.

Purpose and Need

We appreciate the revisions made to the DRAFT Statement of Purpose and Need, resulting from the City's earlier comments, address safety and operational deficiencies that can impact crash rates along and across the corridor, and

*The City of Austin is committed to compliance with the American with Disabilities Act.
Reasonable modifications and equal access to communications will be provided upon request.*

address demand by prioritizing the movement of people, goods, and services.

We request TxDOT include in its statement of Purpose and Need:

- The need to address/enhance people's health and safety within the corridor, and
- The need to acknowledge and address the existing and historic role the facility plays in negatively impacting Austin's communities of color and the natural environment.

We recognize that the I-35 facility through Austin is a physical manifestation of past policies of racial segregation established by the City of Austin in the 1920's. The facility as currently constructed, creates a barrier between our historic communities of color and lower income communities in East Austin and our major work destinations in Central and West Austin. We ask that you consider helping Austin mitigate this in the design of the new facility and to ensure our community does not continue to experience the inequities perpetuated by the existing design. Specifically, we request TxDOT review each opportunity to provide adequate safe crossings of the corridor and to reconnect communities historically divided by the alignment of I-35. The City welcomes the opportunity to partner on some of these connections throughout the larger I-35 corridor to ensure we are constructing complete pathways. We are grateful for your team's willingness to consider these opportunities.

Range of Build Alternatives

The City of Austin requests that TxDOT evaluate all reasonable alternatives, including the community proposed ULI option, alongside the proposed build alternatives. TxDOT's public engagement thus far has not addressed all reasonable alternatives, nor has it demonstrated how the concepts evaluated in the Planning and Environmental Linkages (PEL) Study matured into the existing build alternatives. The City of Austin believes it critical that the administrative record clearly articulate how TxDOT's thinking on build alternatives has matured over time and why other alternatives proposed by the community may or may not be reasonable.

The City also believes it is critical that ingress and egress ramps be included in the operational design and environmental analysis for the build alternatives. Ramping location analysis, both to/from the main lanes and managed lanes, is critical for the public to understand how their neighborhoods will be served or impacted and how access to key employment centers such as the State Capitol Complex, University of Texas, and downtown Austin will be improved. As you know, City staff have proposed a ramping system that would load critical downtown arterials directly from inline depressed ramps and a lowered circulation/distribution lane system in downtown as opposed to requiring access from a surface frontage road. It is our belief that the existing frontage road ramp design leads to the significant grid congestion we experience daily within our primary employment centers. The ramping issue is the linchpin to many other design elements, such as the ability to reduce the number of frontage road lanes and achieve a more urban context for speed and safety. The difference between this ramping strategy and the traditional frontage road ramping can have measurable differences across many of the proposed Evaluation Criteria. We are anxious to understand your findings on how ramping concepts into and out of the major employment centers within the State Capitol Complex, University of Texas, downtown and the East Side could address network gridlock caused by the current loading and unloading of constrained I-35 ramps.

To help our community better understand the Range of Alternatives currently being evaluated, we ask that a more thorough report and public information effort on the evolution of the build alternatives, starting with the needs and resulting concepts identified in the Planning and Environmental Linkages (PEL) Study published by TxDOT and evolving to the current three build alternatives, be incorporated into the Administrative Record and discussed openly at public meetings. We believe there is an opportunity to better inform our community of the process conducted by TxDOT as part of the PEL and the refinement process conducted by TxDOT leading up to the current alternatives being considered. Specifically, we request that TxDOT better explain why the original plan of one tolled managed lane in each direction developed by TxDOT has matured into what are now the non-tolled/HOV two-lane concepts in each direction incorporated into the build alternatives. Likewise, we believe there is an opportunity to better present the TxDOT concepts regarding the number of collector/distributor or operational lanes necessary to assure efficient mobility. Absent such outreach, these concepts appear to be additional roadway capacity lanes. We

believe that continued, robust public outreach by TxDOT on these issues going forward will encourage greater public confidence. We urge TxDOT's public outreach to directly address information related to the inclusion or consideration of the alternative proposed as part of the community-driven concept developed by the Urban Land Institute report dated February 2020.

Evaluation Criteria

We appreciate the opportunity to provide feedback regarding the criteria selected to evaluate the build alternatives. We note from the identified criteria that much of the evaluation will be conducted qualitatively, with a high/medium/low rating. The City of Austin asks that quantitative measures also be used to compare alternatives whenever possible to distinguish the difference between alternatives, thus avoiding any subjective bias that may be inadvertently introduced by a high/medium/low rating approach.

Additionally, if a subjective approach is necessary, the City of Austin requests that thorough technical appendices be developed that provide the quantitative analysis necessary to justify the more subjective high/medium/low summary rating evaluation scores. We recognize that TxDOT will be both the author of the NEPA document as well as the delegated authority responsible for approving the NEPA document. We believe it is important to maximize every opportunity to provide assurance to the community that the evaluation is thorough, transparent and unbiased.

In review of the evaluation criteria, we also note that not all categories should carry equal weight – for example, the size of the overall footprint, safety to bicyclists and pedestrians, the impacts to communities on the East side of Austin, and the value of waterfront park property carry heightened importance to our City.

Detailed Comments:

As indicated in our previous scoping communication, this document provides a single voice on the part of City departments. Attached as an appendix to this letter are suggested revisions to the evaluation criteria and an accompanying detailed comment sheet that provide more context, as well as additional design consideration requests going forward.

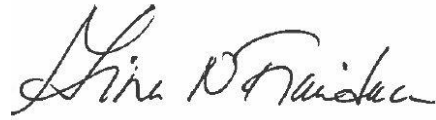
The I-35 CapEx project presents many unique challenges both for the City of Austin and TxDOT, as a nearly 10-year rebuild project through the heart of our city is anticipated. Unlike every other major Texas city, Austin has only one controlled-access freeway feeding its urban core (i.e., the University of Texas, State Capitol Complex, and the Austin central business district). Our level of detailed comments, and potential for competing viewpoints among our departments reflect the complexity of this project.

We also attached the City Council's resolution on I-35, (No. 20210325-063) dated March 25, 2021, for formal inclusion in the Administrative Record.

The City of Austin continues to have great hope for this project that will transform our community. We look forward to continuing to work with TxDOT side-by-side through the design of the project to avoid, minimize, and mitigate the myriad impacts that may be anticipated. This project will affect future generations of Central Texans for years to come. We hope that our comments are constructive and that together we can build a brighter future for our community, a future that truly connects rather than divides all Central Texans.

Mr. Tucker Ferguson
I-35 Second Scoping Response
Page 4
April 7, 2021

Sincerely,

A handwritten signature in black ink, appearing to read "Gina Fiandaca". The signature is fluid and cursive, with the first name "Gina" being more prominent than the last name "Fiandaca".

Gina Fiandaca
Assistant City Manager
Mobility Services
City of Austin
Attachments:

1. City Council Resolution #20210325-063
2. Evaluation Criteria comments
3. Additional Context and Design comments

RESOLUTION NO. 20210325-063

WHEREAS, the I-35 corridor, that bisects downtown Austin, is both an economic generator and a community divider; and

WHEREAS, the City of Austin has invested in the I-35 corridor since 2010 with a community approved \$1 million bond to study new ways to improve mobility within its existing footprint; and

WHEREAS, the City Council adopted Austin Strategic Mobility Plan has committed the City to achieving a 50/50 mode share goal with half of all commuters using means other than single-occupant vehicles by 2039; and

WHEREAS, the City of Austin is working with the Downtown Austin Alliance and community leaders on determining opportunities and priorities for reconnecting communities through the I-35 project; and

WHEREAS, the City of Austin has worked cooperatively with the Texas Department of Transportation (TxDOT) for over a decade to define the need and purpose of the I-35 project, establish feasibility and identify constraints, and participated in the Preliminary Environmental Linkages collaboration and multiple work groups; and

WHEREAS, TxDOT has initiated the Environmental Assessment process on the North and South portions of the I-35 Capital Expressway Project under a NEPA process; and

WHEREAS, TxDOT has initiated an Environmental Impact Statement process on the central portion of the I-35 Expressway Corridor under the National Environmental Policy Act (NEPA) process; and

WHEREAS, the City of Austin is looking forward to an ongoing collaborative process with TxDOT to achieve the goal of improved mobility along and across the corridor while at the same time avoiding impacts and further minimizing and mitigating those that are unavoidable; and

WHEREAS, TxDOT recently conducted a Scoping Phase under the NEPA process for the central portion of the I-35 corridor and the City of Austin staff submitted responses to the phase on December 30, 2021 as referenced in Attachment A; and

WHEREAS, additional responses from City Council Members and the Mayor were also submitted as feedback to TxDOT as part of its Scoping Phase under the NEPA process for the central portion of the I-35 corridor on December 30 and again on December 31, 2021 as referenced in Attachment B; and

WHEREAS, TxDOT extended its initial Virtual Scoping Meeting in response to requests made by various stakeholder groups and members of the community who expressed concern that thirty days was insufficient time for stakeholders to become informed about the project, share information with residents and businesses about the project, and provide meaningful feedback to TxDOT; and

WHEREAS, City of Austin interdepartmental staff, coordinated through the Austin Transportation Department, submitted formal technical comments on the Statement of Purpose and Need and range of alternatives to be considered; and

WHEREAS, Mayor and Council Member feedback further emphasized aspects of the I-35 Corridor project to be addressed, such as:

- Improving safety to address more than 5,300 traffic accidents within the past five years;

- Increasing person-carrying capacity through collaboration with TxDOT, the Central Texas Regional Mobility Authority (CTRMA), Capital Area Metropolitan Planning Organization (CAMPO), Capital Metropolitan Transportation Authority, and other agencies in the region to increase the ability of the highway system to carry more people by managing new and existing capacity;
- Prioritizing and enhancing commuter transit along I-35 as has been done on MoPac resulting in a transit ridership increase of more than 65% for routes using the express lanes. Further, consider a range of alternatives that include direct connector ramps for transit and park and ride facilities that fully align with the Project Connect System Plan, including the planned park and ride in the vicinity of Slaughter Lane;
- Removing I-35 as a physical and social barrier and instead providing a means to reconnect Austin's surface street grid and east Austin communities to downtown and central Austin, and avoid repeating mistakes of the past by erecting new barriers separating parts of our city, with disproportionate burdens placed upon low-income residents and communities of color;
- Coordinating with City of Austin existing local plans and goals such as Austin Climate Goals, Great Street Master Plan, Austin Strategic Mobility Plan, Imagine Austin Comprehensive Plan and impacted Neighborhood Plans;
- Consideration of previous design efforts, including Urban Land Institute, Reconnect Austin, and Rethink 35 proposals;
- Focus on access and reducing vehicle miles traveled;
- Consideration of economic cost accounting of impacts, including death and serious injuries of the current I-35 configuration and the various fully considered alternatives;
- Additional consideration of the economic sustainability and reducing socioeconomic and cultural inequities as part of design alternatives;
- Accounting of human and environmental health impacts, especially for nearby communities, to mitigate air quality issues, flooding potential, noise and other impacts; and

WHEREAS, additional consideration is needed to mitigate impacts to the individuals experiencing homelessness throughout the underpasses during construction and after construction, and there is potential to partner with TxDOT in their challenge to mitigate those impacts through contributions to programs and services for people experiencing homelessness. **NOW, THEREFORE,**

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF AUSTIN:

The City Council, as a body, formally recognizes and endorses the City staff, Mayor and individual Council Member comments, as provided in Attachments A and B, to TxDOT, and reemphasizes to TxDOT the importance and value of the stated comments to the City of Austin and success of the I-35 project. The City Council urges TxDOT to take positive action on these comments in the same good faith way they are offered. As well as consideration of the need to address and mitigate impacts to individuals experiencing homelessness throughout the underpasses during and after construction.

BE IT FURTHER RESOLVED,

The City Manager is directed to engage in an independent effort of communications and public outreach to the community to ensure diverse community input, as well as robust participation and representation to TxDOT.

BE IT FURTHER RESOLVED,

The City Council urges TxDOT to ensure robust and diverse community input by providing no less than 60 days , compared to the standard 30-day comment period (and longer as needed for complete community participation) for the I-35 Capital Express Central Virtual Public Scoping Meeting and all future virtual public meetings and other public comment periods throughout the NEPA process.

BE IT FURTHER RESOLVED,

The City of Austin invites a collaboration with other agencies and jurisdictions to better coordinate opportunities and objectives that lead the I-35 Project to best serve Austin, other impacted jurisdictions, agencies, and communities, as well as the entire state of Texas.

ADOPTED: March 25, 2021

ATTEST:



Jannette S. Goodall
City Clerk



City of Austin

P.O. Box 1088, Austin, TX 78767
(512) 974-2200, Fax (512) 974-2833

Gina Fiandaca, Assistant City Manager

December 29, 2020

Tucker Ferguson
Austin District Engineer
Texas Department of Transportation
7901 N. IH 35
Austin, Texas 78753

Susan Fraser
Mobility35 Project Manager
Texas Department of Transportation
7901 N. IH 35
Austin, Texas 78753

**RE: I-35 Capital Express Central Project CSJ# 0015-13-388
City of Austin Response to Scoping
Statement of Purpose and Need, and Proposed Alternatives**

Dear Mr. Tucker and Ms. Fraser,

On behalf of the City of Austin, thank you and the staff at the Texas Department of Transportation (TxDOT) for your diligent work on the Interstate 35 (I-35) reconstruction project through Central Austin. This project is perhaps one of the most important and potentially beneficial projects to come to Central Texas in the past century.

The City of Austin understands the I-35 corridor is now identified by the Texas Transportation Institute (TTI) as the most congested segment of freeway in the entire state. Austin and Central Texas are known for many firsts, this number-one ranking however is not a ranking we seek to maintain.

While the I-35 Capital Express project holds the potential for great benefit, it also represents a major construction project cutting through the heart of our primary economic activity center. We understand that the promised improvements to mobility will create challenges, but we want to make sure that the proposed project is consistent with our adopted vision for mobility within the City of Austin; that unavoidable impacts from construction are minimized and mitigated appropriately; and that we can remain strong partners with TxDOT in deploying this most needed project. Please accept this letter, with its attachments, as the City of Austin's formal response to your scoping request for comment on the Statement of Purpose and Need and Range of Alternatives.

I also want to express our thanks for the extended comment period you provided. The City of Austin had requested a 90-day extension for the comment period due to the impacts of the current COVID crisis and the holiday season. You were not able to honor that request, but you

did extend the comment period through the end of December 2020. My staff greatly appreciate the additional time you were able to afford. You have also committed to additional and ongoing agency and public engagements as the project progresses. These engagements include further discussion on the alternatives and evaluation criteria in early 2021.

Our comments are divided into two sections related to 1) comments on the Statement of Purpose and Need; and 2) comments on the range of alternatives. Attached with this letter is a matrix of specific comments provided by city departments and several formal resolutions taken by relevant city boards and commissions. Please consider the specific comments from City Departments as part of our formal comment on the Purpose and Need and proposed Alternatives. Please consider the formal resolutions as independent comments presented by those boards and commissions. We have attached the resolutions so that you have a full communication from the City.

**1) City of Austin Comments on TxDOT's
Proposed Statement of Purpose and Need**

Policy Alignment on Demand Management

TxDOT states, "The proposed project is needed to improve I-35 between US 290 East and US 290 West/SH 71 to...meet current and future travel demand." The City of Austin has adopted clear priorities for mobility in our adopted [Austin Strategic Mobility Plan](#) (ASMP) with a primary strategy to meet the City's mobility goals by **addressing congestion by managing demand**. We understand that we cannot build ourselves out of congestion by expanding unmanaged capacity for single occupancy vehicles. Instead, we believe we must do everything possible to shift travel demand from driving alone to other forms of transportation. We must solve future congestion problems by building highways that prioritize person-carrying capacity¹ over adding unmanaged vehicle travel lanes; encouraging transit and carpooling/vanpooling; and enabling safe, active transportation modes along and across freeway barriers.

¹ ASMP Roadway System Policy 3: Increase the person-carrying capacity of the highway system

Collaborate with TxDOT, CTRMA, CAMPO, Capital Metro, and other agencies in the region to increase the ability of the highway system to carry more people by managing new and existing capacity

Today, 74% of Austinites drive alone to work. The ASMP forecasts that with a 50/50 mode share in 2039, where 50% of commuters in Austin drive alone and 50% use other modes of travel (including the option to not travel), that the region's roadway system will operate as well as if not better than it operates today. TxDOT's own traffic analyses developed as part of the I-35 Environmental Linkages study suggested that the region needs to significantly reduce the demand on the facility for any future alternative to be successful. Transportation Demand Management (TDM) concepts should be incorporated and funded by TxDOT as part of all alternatives.

The Texas Transportation Institute (TTI), sponsored by TxDOT, issued the [Mobility Investment Priorities Project](#) final report for the I-35 Corridor in 2013. It calls for a 25-40% reduction in local travel demand plus critical managed capacity expansion. These changes would be the only means of significantly improving I-35's levels of congestion and the resulting gridlock on City streets, according to TTI. To achieve this level of reduction, it is critical for I-35 to support robust design elements that encourage alternative modal choice, removing barriers from individuals choosing alternative ways to travel. Most critically, to achieve the 50% level of mode shift it is necessary for I-35 to provide time-competitive transit service, largely through a park-and-ride model with direct and exclusive or prioritized transit access to managed lanes. As the region continues to grow, and Austin's transportation network continues to mature with supporting high-capacity transit and all ages and abilities bicycle systems, it is critical that we recognize achieving this mode shift is absolutely necessary for the health, safety and prosperity of the entire region.

Safety

According to TxDOT's crash statistics, over 5,900 crashes were reported on I-35 mainlanes and frontage roads within the extent of this project between October 2015 and October 2020. These crashes resulted in the loss of at least 30 lives and over 140 serious injuries.

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, and other issues of driver convenience on the corridor. The statement should explicitly describe the need to improve safety, including at the very least, inclusion of crash statistics on the corridor. For context, 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.

In March 2017, the Federal Highway Administration (FHWA) Resource Center led 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. 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. A pedestrian/bicycle bridge between 51st Street and US 290 could be accommodated by elevating managed lanes 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.

Pedestrian fatalities are not a behavioral issue that can be addressed through education and enforcement. It is a design issue that data indicate is a uniquely Texan problem: according to an [analysis](#) of pedestrian fatalities on interstate highways conducted by the AAA Foundation, Texas has the highest total number of pedestrian fatalities on interstate highways, highest percentage of total interstate highway fatalities that are pedestrians, highest pedestrian fatality

crash rate per 100 fatal interstate crashes, and highest pedestrian fatality crash rate per 10 billion interstate vehicle miles traveled of all 50 states.

The City of Austin requests that safety, especially the reduction in fatalities and serious injuries, be at the top of the State's agenda when developing this project and comparing alternatives in the Environmental Impact Statement (EIS). Furthermore, to assure maximally safe design, we request that TxDOT utilize context-sensitive urban design standards as authorized by TxDOT policy to design a roadway that reflects the surrounding community and better addresses the needs of vulnerable roadway users along the corridor. We request that the recommendations from the March 2017 FHWA RSA be incorporated into the design of all alternatives, acknowledging the need to address safety within the corridor.

In addition, including air quality and noise impacts as a public health need is critical to the success of this project. Greenspace and trees can provide beneficial air quality impacts that could mitigate adverse impacts from increased vehicular traffic as well as help mitigate the urban heat island effects.

North/South and East/West Trip Needs

As TxDOT considers mobility, the City of Austin requests the EIS address the need for improved mobility in both the North/South direction as well as the East/West direction across the facility. Since its construction, the central portion of I-35 has been a barrier between East and Central Austin. The facility is situated along what was formerly the racial dividing line of Austin, established by City Ordinance as part of our 1928 land use plan. The new I-35 Capital Express has a role to play in rectifying this historical inequity for Central Texas. Specifically, U.S. Presidential Executive Order 12898 (1994), requires agencies identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations. Because of the impacts I-35 continues to have on minority and low-income populations, the project needs to respect this history and mitigate through context-sensitive design, through inclusion of art in public places, and through contextualization of its role in establishing and maintaining this racial and equity divide. The project also needs to assure sufficient East/West connectivity is reestablished to correct for its historic role in dividing communities of color and other environmental justice communities from the employment opportunities in Central Austin, the State Capitol Complex, and other points west of the barrier. It cannot be designed in a way that perpetuates the barrier. Crossings need to be robust and provide wide margins for community activity to encourage safe and efficient pedestrian and bicycle connectivity. The program must also consider the potential impact on affordability and sustainability of neighborhoods on Austin's Eastside with the removal of the historic barrier. TxDOT should coordinate with the City of Austin to assure appropriate policies are developed to protect existing communities from potentially being priced out of their neighborhoods in the future.

Mitigate Unavoidable Impacts Within Footprint of Facility

The City of Austin requests that TxDOT mitigate unavoidable impacts from reconstruction of the Capital Express within the footprint of the facility to the maximum extent possible. The project needs to mitigate unavoidable impacts to parklands and sensitive noise receptors on-facility wherever possible in conjunction with the added East/West connectivity we have requested. This need suggests that sufficiently wide bridge structures or lids should be included

in the definition of the base alternatives to allow these mitigation options to be evaluated in the project's National Environmental Policy Act (NEPA) EIS. All mitigation needs to be designed to be context appropriate for the surrounding urban land uses.

Operational Objective to Move People, Goods and Services

The City of Austin requests that the operational objective of the study be to move the greatest number of people, goods and services along and across the corridor as opposed to the implied objective stated by TxDOT's Purpose and Need to reduce congestion. Specifically, we request that a variable tolled concept be evaluated alongside the HOV2+ scenario because we believe that the environmental impacts associated with variable tolled managed lanes as compared to an HOV2+ regime will be lessened. Moreover, the toll concept will better achieve the person-moving objective of the City. Prior traffic studies conducted during the TxDOT I-35 Environmental Linkages Study suggested that HOV2+ could result in lingering congestion on non-tolled managed lanes. This implies that, with an HOV2+ designation, either the transit service would be caught in that same carpool congestion or that a portion of the alternative might need to be designated as transit-only. Furthermore, transit access exits and entrances to the managed lanes would likely need to be separated from the HOV2+ to achieve operational efficiencies. That would increase the likelihood of added environmental and financial impacts. As has been demonstrated with the MoPac (Loop 1) North toll-managed lane, mixed transit and tolled use of ramping can be managed within the same envelope by increasing tolls to achieve the appropriate flow conditions. Under these conditions, separated transit lanes or independent ramps are not needed, thus reducing the footprint of the facility and potentially the environmental impacts.

Inclusion of Ramping as Part of EIS Analysis

The City of Austin requests that ramping into/out of the City's grid system be evaluated as part of the EIS. As stated by TxDOT's own studies, 85% of the traffic on I-35 is local to the Central Texas region. Alternatives, including ramping options, should be evaluated and included as part of the EIS to appropriately evaluate the potential impacts. The City has proposed a ramping system that would load critical downtown arterials directly from inline lowered ramps and a lowered circulation/distribution lane system in downtown as opposed to requiring access from a surface frontage road. We request that this concept be included in one or more of the alternatives for evaluation. Much of the existing congestion during the PM peak period in our downtown is directly caused by operational loading constraints of the I-35 frontage roads' ramps. Congestion from the freeway backs up onto surface streets, eventually causing circular congestion and gridlock. The City believes that this alternate ramping methodology proposed by the City could significantly reduce urban congestion within our grid.

Proposed Restatement of Purpose and Need

Considering these comments, the City of Austin request that changes be made to the TxDOT Statement of Purpose and Need, replacing it in total with the following revised statement:

The proposed project is needed to improve I-35 between US 290 East and US 290 West/SH 71 to manage current and future travel demand by maximizing the ability of the facility to move people, goods, and services. The existing roadway does not meet current federal, state, or urban context-sensitive design standards, contributing to unacceptable fatalities and serious injuries due to vehicle crashes. The current design leads to operational deficiencies and longer travel times for all users, including emergency response vehicles and transit, particularly during peak hours. The proposed project is also needed to improve both north-south travel on I-35 as well as east-west travel across the facility, including bicycle and pedestrian paths and transit access within the project limits. The project is needed to address and mitigate its impacts on the surrounding community, including addressing the historic east-west barrier created by the facility and the impacts caused to Austin's communities of color.

The purpose of the proposed project is to improve this critical local, regional, national, and international thoroughfare by enhancing people's health and safety within the corridor by reducing crashes; managing demand by prioritizing the movement of persons, goods and services through and across the corridor, thus addressing congestion; improving operational efficiency, creating a more dependable and consistent route for the traveling public for all modes of transportation (including bicyclists, pedestrians, emergency responders and transit); and, addressing the existing and historic environmental and community impacts caused by the facility.

2) City of Austin Comments on Range of Alternatives

The City of Austin has identified design elements which are essential for all build alternatives to accomplish the purpose and need of this project. The current range of alternatives do not sufficiently respond to the needs identified by the City of Austin. Earlier alternatives proposed by TxDOT for consideration included narrower alternatives that focused on travel demand into and out of the City of Austin. (Please note that TxDOT's own studies show that 85% of the travel on I-35 is local to the region and not through travel). These alternatives used operational elements such as toll managed express lanes into and out of the downtown, circulation and distribution lanes instead of mainlane capacity to facilitate movements on and off of the primary facility, and direct ramping into/out of the managed lane component with appropriate lane drops and additions. These options resulted in a narrower design profile on all alternatives. We respectfully request that TxDOT justify the level of non-managed roadway capacity being provided in all alternatives carried into environmental consideration. We believe that any new through capacity should be strictly managed using variable toll operations, thus limiting the number of non-managed mainlanes needed within the corridor. We believe that narrower surface-level frontage roads are warranted. We believe this can be achieved by considering alternate ramping configurations, making use of circulation-distribution lanes more completely, and greater investment in multimodal elements of the corridor, to encourage

travelers to use other forms of mobility. We respectfully request TxDOT propose alternatives that meet these needs and that also respond to the following issues.

Context Sensitive Design

An essential need for this project is to create sufficient access and egress points to Central Austin destinations that facilitate economic activity and reduce the regular traffic backups in the central core attributed to current limited or difficult access points.

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 mainlane-bound traffic to use the frontage roads and reduce the necessary number of additional frontage lanes. TxDOT should analyze traffic operation for this concept as part of one or more of the alternatives advanced for detailed consideration in the EIS. The study should determine if it would enable smaller, safer, and calmer people-centric signalized surface streets with the bulk of mainlane-bound traffic 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 such as Dean Keeton Street, Martin Luther King Jr. Boulevard, 15th Street, 6th/7th Streets, and Cesar Chavez Street.

Existing frontage roads were designed and constructed with the motor vehicle as their primary focus. Since that time, the City of Austin has evolved its transportation network design to better accommodate all street users based on best design practice. Subsequently, I-35 frontage roads should be redesigned to urban boulevard standards, which buffer the highway from the adjacent commercial and residential land uses through lower design speeds and features such as street trees and pedestrian-scale lighting. The National Transportation Safety Board (NTSB) concluded in its 2017 [study](#) that speeding is a primary contributing factor to fatalities and serious injuries, whose countermeasures include context-sensitive design and lower speed limits. TxDOT should use City of Austin's adopted NACTO's [Urban Design Guide](#) for design guidance. In setting speed limits, emerging practices include the Federal Highway Administration's [USLIMITS2](#) safe systems approach and NACTO's [City Limits Guide](#). TxDOT's own [Procedures for Establishing Speed Zones](#) allow considerations other than prevailing speed to be considered when setting speed limits.

These new urban boulevards should also incorporate safer designs at intersections, typically where conflicts between modes are the most prevalent in severity and number. The City of Austin uses a "smart right" design for its intersection safety improvement projects where channelized right-turn lanes can be provided. By slowing motorized vehicles with raised crosswalks and tighter angles through the turn lanes, yield compliance and safety can be improved. TxDOT has developed its own guidelines for application through a [research study](#) with the University of Texas Center for Transportation Research. The City of Austin has collaborated with TxDOT to fund, design, and construct smart rights on TxDOT roadways at Martin Luther King Jr. Boulevard/I-35 Frontage Roads and N Lamar Boulevard/Parmer Lane. Driveways along the frontage roads are likely to be reconstructed with this project. The City of

Austin further requests TxDOT consider opportunities to consolidate driveways and providing smaller radii to slow speeds and reduce crossing distances for pedestrians and bicyclists at all intersections as part of one or more of the alternatives advanced for detailed consideration in the EIS. Tighter radii and shorter intersection crossings improve pedestrian safety in what will remain a fairly car-centric environment.

Multimodal Capacity Elements

The City of Austin adopted the [Austin Bicycle Plan](#), [Austin Sidewalk & ADA Transition Plan](#), and [Austin Urban Trail Plan](#). Preservation of active transportation connections and corridors within the I-35 Corridor included in these adopted plans is essential. For example, project alternatives should provide a high-quality connection between the I-35 shared use paths and the Lady Bird Lake trail system as an element of the signature bridge envisioned by TxDOT over the Colorado River (e.g., connection to the Butler Hike and Bike Trail on the north shore and the Boardwalk on the south shore).

The City of Austin believes it is essential that concepts be explored for connecting the managed lanes to planned transit facilities as part of one or more of the alternatives advanced for detailed consideration in the EIS. These include the intersections at Riverside Drive and Dean Keeton Street as part of the defined project and funded by the overall project budget. Attention to design that is preferred for safe and efficient transit operations is critical. For example, the alternative designs should eliminate the existing sweeping slip lanes and entrance ramps at Dean Keeton Street in preference of a more typical at-grade intersection with the I-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). This direct access is of strong interest to the City of Austin and to Capital Metro. The Dean Keeton Street crossing should also account for future high-capacity transit operating in exclusive right-of-way as planned in Project Connect and the ASMP. Another example is the 4th Street crossing and the adjacent Capital Metro railroad. These are important multimodal connections that should be designed to improve safety while minimizing disruptions to operations. Alternative designs at this location should include evaluating grade separating the railroad and bicycle/pedestrian facilities from the frontage roads as part of one or more of the alternatives advanced for detailed consideration in the EIS.

East-West Connectivity

The project should be designed with the future investments in mind, and to the maximum extent possible not preclude future east-west crossing structures, regardless of design or function, by other agencies or future processes.

The City of Austin requests that proposed modifications to existing connections or new connections across I-35 be closely coordinated with the City. Based on the proposed elevations of the I-35 lanes, connecting 5th Street between downtown and East Austin is feasible and would provide a key new access route. The City is supportive of this crossing and requests ramping options (such as the City's proposed perpendicular ramping concept) be considered that would allow the possible reconnection of 6th Street as well. These options should be considered as part of one or more of the alternatives advanced for detailed consideration in the EIS.

Emergency Response

The proposed alternatives suggest that a combination of tunnels, bridges, elevated lanes, and lowered lanes and future lidding may be used to accommodate the needed improvements defined in the Statement of Purpose and Need. Access, egress, operational space for first responders and adequate ventilation must be ensured to provide adequate safety for travelers and for emergency professionals in the event of an incident. In addition to federal tunnel [design standards](#), TxDOT should consider standards from the National Fire Protection Association such as [NFPA 502](#). The handling of flammable and other hazardous cargo that may use the I-35 Capital Express portion of the corridor should be considered early in the design and environmental review process. Although it is likely that an alternate hazardous cargo route will be designated, some level of hazardous material movements through the corridor are likely.

Utility and Project Coordination

Multiple City of Austin and private utilities own and maintain infrastructure that extends into and across I-35 within the extents of this project. The adopted ASMP recognizes the need to "balance mobility and utility needs." The City of Austin requests TxDOT acknowledge that discussion of utility relocation and the need for utility conflict resolution be prioritized in coordination efforts, and that consideration will be given to schedule and cost of these utility impacts to ensure continued service, access and maintenance. TxDOT should include design solutions to future-proof lateral connections. For example, conduits can be constructed into new bridge structures for essential electricity, water, and broadband utilities rather than burying them at generally inaccessible locations.

Intelligent Transportation Systems

TxDOT should consider adding a base level of enabling infrastructure for Advanced Traffic Operations, Intelligent Transportation Systems (ITS), and Connected Vehicle Operations. Specific to Advance Traffic Operations, additional data and decision support systems are necessary 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. 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.

Design Alternatives that Reflect Management Concept and Consideration of Variable Tolls to Maximize Operational Efficiency while Minimizing Impacts

In the TxDOT proposed range of alternatives, the State indicates it is planning to deploy the managed lanes as HOV2+. However, the draft alternatives are designed as through facilities and do not reflect the management realities of serving carpools headed for primary employment centers. Carpools and commuter bus transit, the typical users of HOV facilities, serve primary employment centers and not through trips. The managed lane elements of the proposed alternatives advanced for detailed consideration in the EIS should take into account the operational regime as part of the design. The City requests that the State examine the operational characteristics of the management technique to be used and design the alternatives to meet that need.

In addition to HOV2+, the City of Austin requests the State consider dedicating half the proposed managed lane capacity in each direction as transit-only lanes to accommodate the needs for an efficient and effective commuter transit system as part of one or more alternatives advanced for detailed consideration in the EIS. The City believes that demand for an HOV2+ managed facility will exceed the operational capacity of the new managed lane system and that only with dedicated transit capacity can transit efficiently operate and provide a time advantage over the adjacent carpool lanes. Transit-only ramps may also need to be included as part of the proposed alternative for detailed consideration in the EIS (with or without the dedicated transit lane) to assure expeditious access and egress to the facility by transit. The objective of this request is to maximize the people moving capacity of the proposed alternatives in order to meet the stated purpose of the project and thus address congestion on the network.

In addition to HOV2+, the City of Austin requests the State include in alternatives advanced for detailed consideration in the EIS management by variable tolls, similar to the management strategy on MoPac (Loop 1) North. Management by variable tolls would eliminate the need to manage by occupancy and could provide a revenue stream to reduce the burden of the project on the State's limited transportation finances. Likewise, use of variable tolls could reduce the environmental impacts of the facility and provide long-term operations and maintenance funding for the facility.

Construction Sustainability Practices

The City of Austin also requests TxDOT utilize the [FHWA Invest Tool](#) to create a sustainability plan that will guide project development and operations.

This project may challenge the City of Austin's ability to fulfill the adopted [Imagine Austin Comprehensive Plan](#), [City Council Resolution 20071129-045](#), and [City Council Resolution 20090115-050](#) to ensure that goals, standards and criteria for achieving the highest optimal outcomes for sustainability are implemented. For benchmarking and in appropriate evaluative sections of the EIS, TxDOT should use the [FHWA Invest Tool](#) to create a sustainability plan that provides guidance and benchmarking for system planning, project development, and operations and maintenance standards. In particular, the City of Austin encourages an aggressive Construction and Demolition Waste Management Plan (CWMP) and specifications to include Sustainable Pavements.

The City of Austin asks that TxDOT initiate a regional construction coordination effort with other regional and local jurisdictions that are constructing regional infrastructure. In addition to the planned construction sequencing for this project, the region will have construction for several large-scale projects and programs. These include Capital Metro's Project Connect, the City's 2018 and 2020 City of Austin Mobility Bonds programs, Central Texas Regional Mobility Authority's (CTRMA) MoPac (Loop 1) South Managed Lane Projects, and other TxDOT and utility infrastructure projects. Together, the construction sequencing of all these efforts presents a unique mobility challenge, with many of the projects intersecting either physically or in time. These overlaps will exacerbate regional traffic and could lead to roadway construction work zone safety impacts such as work zone congestion and back-of-queue safety concerns. Early and continuous coordination could lessen these unavoidable impacts.

Reduce Air Pollution Impacts of Project

The City of Austin also requests that TxDOT consider incentivizing inherently low emission vehicles (ILEV) for travelers through appropriate management concepts applied to the corridor, either by allowing their access to the HOV managed lanes or reduced fee entry into variable-tolled managed lanes as proposed by the City. Incentives for ILEV could expand the electric vehicle fleet here in Central Texas, address air quality impacts that might be associated with an expanded I-35 Corridor and help to address air quality in support of the Early Action Compact established by the region through the Capital Area Council of Governments (CAPCOG). ILEV should be included in one or more of the alternatives advanced for detailed consideration in the EIS with comparative analysis in the air quality section of the EIS.

Avoid Watershed Impacts

The City of Austin requests that TxDOT coordinate with the City of Austin Watershed Protection Department 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 per the City's adopted [Watershed Protection Plan](#). The City requests that TxDOT mitigate existing impacts from the current non-detained and untreated stormwater runoff of the I-35 system and maintain the integrity of the Waller Creek Tunnel, the drainage systems contributing to the tunnel, and the Tax Increment Financing (TIF) Reinvestment Zone that the tunnel serves per the City of Austin's [Waller Creek District and Tunnel Framework Plan](#).

City of Austin Proposed Revised Range of Alternatives

Based on our review, the City of Austin requests that in addition to the alternatives proposed by TxDOT the following concepts be developed, advanced for detailed consideration, and evaluated as part of the I-35 Capital Express EIS:

- Add two non-tolled managed lanes in each direction, with one of these lanes designated as transit-only in each direction and the remaining lane in each direction managed as an HOV lane with appropriate occupancy criteria to maintain acceptable flow rates, removing the upper decks on I-35 (between Airport Boulevard and MLK Jr. Boulevard), and lowering I-35 through downtown (between MLK Jr. Boulevard and Holly Street), with ramping appropriate for access to major trip generators in downtown and central Austin. Consider the ability to drop one lane in each direction to the downtown to facilitate access. Transit access should be prioritized with dedicated transit lanes if necessary, as part of the managed lane definition.
- Add two variable tolled lanes in each direction, removing the upper decks on I-35 (between Airport Boulevard and MLK Jr. Boulevard), and lowering I-35 through downtown (between MLK Jr. Boulevard and Holly Street), with ramping appropriate for access to major trip generators in downtown and central Austin. Consider the ability to drop one lane in each direction to downtown to facilitate access.
- Across all alternatives:
 - Include the ability to evaluate alternative ramping scenarios as proposed by the City in downtown (i.e., direct ramp access into the perpendicular arterials as

well as ramping from traditional parallel surface access or boulevard roadways).

- Include the ability to provide wide cross-structures or lids within the footprint of the corridor as part of the base mobility project in order to help mitigate impacts associated with access, parkland 4F and 6F impacts, noise, and impacts to Environmental Justice communities.
- Demonstrate the need for proposed number of lanes (managed, mainlanes, circulation/distribution, and frontage road lanes) included with each alternative. Reduce the number of non-managed lanes where possible in preference to using circulation/distribution lanes to achieve efficient loading and unloading. Reduce the width of frontage road concepts by using alternate direct ramping solutions such as those suggested by the City of Austin for downtown arterial access.

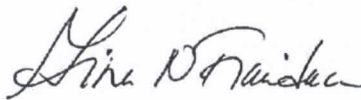
City of Austin Commitment to the I-35 Capital Express Project

The City of Austin and TxDOT have collaborated for over a decade on the I-35 corridor through Austin. In 2010, the City of Austin, in partnership with the TxDOT Austin District, initiated efforts using local capital funding to reengage the public in discussions related to the need for a project in the I-35 Capital Express corridor. This early effort has led to the completion of the I-35 at US290 W/SH71 interchange, and the numerous interchanges and cross-over improvements throughout the corridor. In 2020, the City along with other regional leaders in Central Texas, committed nearly \$1 billion in local metropolitan transportation funding towards the proposed I-35 corridor projects. The City, in coordination with the Downtown Austin Alliance and other regional organizations, is now funding a nearly \$500,000 engineering effort to help develop design parameters for a potential freeway lid to help the State mitigate the impacts of the future freeway corridor. We stand ready to continue our partnership with TxDOT to expeditiously move through the I-35 environmental and construction process to minimize the adverse impacts to our community. We believe that ongoing engagement of the City is important and, in turn, that we need to independently engage our community so that we can adequately articulate their needs and concerns to the project evaluation team. We have seen from Houston's experience on the I-45 replacement project, that late coordination by the City and lack of independent public engagement has led to unsatisfactory Draft EIS and Final EIS outcomes for many parties, threatening the project timelines. We seek to avoid similar delays here in Central Texas and so along with the engineering effort to deliver lidding parameters, we will launch an appropriate public outreach process to help collect input on the City's role on the project. We will continue to engage our citizen-led Boards and Commissions and our Council policy makers to make sure they are adequately informed and engaged. It is our desire to help the TxDOT Austin District make this project a success, and we are committed to helping seek public consent on this transformational project.

The Austin Transportation Department (ATD) will continue to serve as the coordinating department for the City of Austin and interact with the I-35 Capital Express as the project's point of contact. ATD has assembled comments from City Departments and Utilities and has combined them into a single tabular format. These comments should be considered as the City's detailed comments, reinforcing the more general ones presented in this letter.

Furthermore, ATD has worked with the Urban Transportation Commission and with both the Bicycle and the Pedestrian Advisory Council, all of which have passed formal resolutions related to their comments on the project, Statement of Purpose and Need, and alternatives. ATD has attached those resolutions to the end of the City's comments for your reference. As independent boards and commissions, these resolutions should be considered as formal comments from these citizen-led entities. Thank you again for the opportunity to provide the formal City of Austin comments.

Sincerely,



Gina Fiandaca
Assistant City Manager, Mobility Outcome
City of Austin, Texas

Cc: Mayor and City Council Members
Spencer Cronk, City Manager
City of Austin Executive Team
Robert Spillar, Director, Austin Transportation Department
Mike Trimble, Officer, Corridor Program Office





City of Austin

Steve Adler, Mayor

301 W. 2nd St., Austin, TX 78701
(512) 978-2100, Fax (512) 978-2120
steve.adler@austintexas.gov

December 30, 2020

I-35 Capital Express Central Project
Attn: Project Team
1608 W. 6th Street
Austin, TX 78703

RE: Capital Express Program Comments

As elected leaders in Austin and Travis County, we are grateful to the Texas Transportation Commission (TTC) and Texas Department of Transportation (TxDOT) for including full funding for the I-35 Capital Express North, Central, and South projects in the most recently approved Unified Transportation Program (UTP). These projects represent an once-in-a-lifetime opportunity to achieve several regional and local transportation goals. We recognize that this funding could have been programmed for critical projects in other cities, and we thank you for providing Austin and Travis County with an opportunity for a safer, more efficient, and reliable I-35.

We have collectively heard a variety of ideas, questions, and concerns from our constituents and community stakeholders regarding the Capital Express program, and provide the following comments that are applicable to all three projects.

Improved Safety

It is vital that improved safety for all users be recognized as the primary Purpose and Need for all three Capital Express projects. I-35 is among the most dangerous roadways in the state and is by far the deadliest roadway in Austin. Within the past five years, over 5,300 traffic accidents have occurred on the segments of I-35 in Austin. Austin Strategic Mobility Plan Designing for Safety Policy 5 is to minimize the safety risks of highways by working closely with transportation partners to ensure that the safety of vulnerable roadway users is a primary consideration in the design and operation of new highways and retrofits of existing highways. City of Austin taxpayers have recently committed tens of million dollars of local funds to reduce traffic deaths and serious injuries in our city, and while much progress is being made, we cannot meet our goals until safety on I-35 dramatically improves. We are heartened by the TTC's own ambitious goals to reduce deadly crashes in Texas by half by 2035 and to zero by 2050. With so much consensus regarding the need to reduce traffic fatalities, we believe the Purpose and Need statement should be revised to reflect safety as a priority.

Increasing Person-Carrying Capacity

The Austin Strategic Mobility Plan Roadway System Policy 3 is to increase the person-carrying capacity of the highway system by collaborating with TxDOT, CTRMA, CAMPO, Capital Metro, and other agencies in the region to increase the ability of the highway system to carry more people by managing new and existing capacity. We recognize that the existing highway system, including I-35, does more than just carry vehicles; it moves people. Unfortunately, the number of people it moves is not enough, as most of those vehicles are only carrying a single person. Without significantly expanding the highway system we will not be able to carry more vehicles, but we know that it is not possible to expand these regional roadways enough to adequately serve the projected demand in the limited space that exists. It is imperative that we use strategies that increase the person-carrying capacity of the highway system to move more people and not just vehicles. We believe strongly that the addition of new, non-toll managed capacity will not sufficiently accomplish this goal. The use of dynamic pricing for toll-managed lanes on North MoPac, and the resulting dramatic increase in transit use, should serve as a model for what is possible on I-35. To that end, we appreciate the assurances received from our District Engineer that the I-35 projects will not be funded with Proposition 1 or 7 funds, nor will the environmental process be conducted in a manner that precludes a later decision on the use of tolls to manage new capacity on I-35. We recommend that the Purpose and Need statement be revised to reflect increasing person-carrying capacity as a priority, and the range of alternatives to be analyzed include the use of dynamic toll managed lanes with appropriate access for managed lanes to major trip generators in downtown and central Austin.

Prioritize and Enhance Commuter Transit

In addition to considering dynamic tolling to maximize person-carrying capacity on I-35, prioritizing transit is critical to achieving local goals for I-35. Austin Strategic Mobility Plan Public Transportation System Policy 2 is to enhance commuter public transportation service by supporting commuter public transportation service from outlying neighborhoods and surrounding communities into and out of Austin activity centers utilizing managed lanes. Commuter transit service has the potential to be more productive and time-competitive by prioritizing transit on Austin's highways using flexible and managed lanes. Commuter routes are often limited due to their less frequent yet more direct "one-seat rides." However, we have seen transit ridership increase by more than 65% for routes using the express lanes on MoPac, where the speed and volume of the lanes are managed and public transit users ride toll-free. We recommend that the Purpose and Need statement be revised to reflect enhancing commuter transit as a priority, and the range of alternatives to be analyzed include designs that allow for maximum efficiency of transit, including direct connector ramps for transit and park and ride facilities, and that are fully aligned with the Project Connect System Plan, including the planned park and ride in the vicinity of Slaughter Lane.

Removing I-35 as a Physical and Social Barrier

The construction of I-35 resulted in the further isolation and segregation of communities of color on the east side of Austin. Austin Strategic Mobility Plan Equity Policy 1 is to acknowledge and learn from the negative effects of past transportation and land use decisions by recognizing that historically, communities of color, low-income communities, and people with disabilities have been most negatively impacted by transportation and land use policy and infrastructure due to barriers leading to a lack of representation and institutional power. We are heartened by early indications that TxDOT will consider design concepts which would remove I-35 as a physical and symbolic barrier by depressing main travel lanes, removing elevated sections, and reconnecting portions of Austin's surface street grid. We recommend that the Purpose and Need statement be revised to reflect removal of I-35 as a physical and social barrier as a priority, and the range of alternatives to be analyzed include designs that allow for decks to be added over depressed sections, which could serve as parks or opportunities to serve other community needs, thus further mitigating the negative effects of past transportation and land use decisions. Further, we share our community's concern with proposed new elevated sections for Capital Express South and a possible elevated scenario for Capital Express Central. We recommend the range of alternatives to be analyzed include designs that minimize the construction of any new elevated sections, as these may repeat mistakes of the past by erecting new barriers separating parts of our city, with disproportionate burdens placed upon low-income residents and communities of color.

Again, we thank the Commission and TxDOT staff for the commitment to this program of projects. We share the goal of maximizing the safety and effectiveness of our transportation system and appreciate your consideration of these comments.

Sincerely,



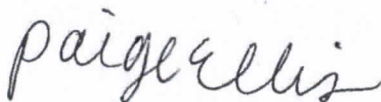
Steve Adler
Mayor



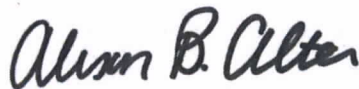
Natasha Harper-Madison
City Council Member, District 1



Ann Kitchen
City Council Member, District 5



Paige Ellis
City Council Member, District 8



Alison Alter
City Council Member, District 10



City of Austin

Ann Kitchen, District 5

301 W. 2nd St., Austin, TX 78701
(512) 978-2105, Fax (512) 978-2115
ann.kitchen@austintexas.gov

December 31, 2020

I-35 Capital Express Central Project

Attn: Project Team

1608 W. 6th Street

Austin, TX 78703

RE: Capital Express Program Comments

As elected leaders in Austin and Travis County, we appreciate the Texas Transportation Commission (TTC) and Texas Department of Transportation (TxDOT) full funding for the I-35 Capital Express North, Central, and South projects in the most recently approved Unified Transportation Program (UTP). We recognize that this funding could have been programmed for critical projects in other cities, and we thank you for providing Austin and Travis County with an opportunity for a safer, more efficient, and reliable I-35 to help achieve regional and local transportation goals.

We have collectively heard a variety of ideas, questions, and concerns from our constituents and community stakeholders regarding the Capital Express program, and provide the following comments that are applicable to all three projects.

These comments are in addition to the letter we have also signed and sent in from the City of Austin, which provides more detail on those recommendations.

Additional Factors Related to Meaningful Design Alternatives

In addition to the recommendations cited in our letter from the City of Austin, we propose that scoping fully consider a range of alternatives that match the wide array of community needs and which address the following:

1. Compatibility with existing local plans and goals as they impact the I-35 corridor, including:
 - Adopted Austin neighborhood plan impacting the I-35 corridor
 - Austin Climate Goals, including as set forth in Austin City Council Resolution 20140410-024
 - City of Austin Great Streets Master Plan and Street Design Guide
 - COA Vision Zero Goals, Imagine Austin Comprehensive Plan, Austin Strategic Mobility Plan
2. Consideration of previous design efforts, including ULI, Reconnect Austin, and Rethink 35 proposals
3. Goals that focus on access and reducing vehicle miles traveled
4. Economic cost accounting of impacts, including deaths and serious injuries, of the current I-35 configuration and of the various fully considered alternatives
5. Furthering economic sustainability and reducing socioeconomic and cultural inequities, in collaboration with the City of Austin, by considering as part of design alternatives:
 - Opportunities for tools such as value-capture programs to harness increased revenues from I-35 improvements to help protect historic and cultural resources, and prevent displacement



City of Austin

Ann Kitchen, District 5

301 W. 2nd St., Austin, TX 78701
(512) 978-2105, Fax (512) 978-2115
ann.kitchen@austintexas.gov

- Opportunities to evaluate how much land to use for mobility right-of-way and how much should be used for other uses such as affordable housing, local businesses, and public space
- 6. Human and environmental health impacts, especially for nearby communities, to mitigate air quality issues, flooding potential, noise, and other impacts.

Recommendations from Previous COA Letter:

- **Improved Safety:** With so much consensus regarding the need to reduce traffic fatalities, we believe the Purpose and Need statement should be revised to reflect safety as a priority.
- **Increasing Person-Carrying Capacity:** We recommend that the Purpose and Need statement be revised to reflect increasing person-carrying capacity as a priority, and the range of alternatives to be analyzed include the use of dynamic toll managed lanes with appropriate access for managed lanes to major trip generators in downtown and central Austin.
- **Prioritize and Enhance Commuter Transit:** We recommend that the Purpose and Need statement be revised to reflect enhancing commuter transit as a priority, and the range of alternatives to be analyzed include designs that allow for maximum efficiency of transit, including direct connector ramps for transit and park and ride facilities, and that are fully aligned with the Project Connect System Plan, including the planned park and ride in the vicinity of Slaughter Lane.
- **Removing I-35 as a Physical and Social Barrier:** We recommend that the Purpose and Need statement be revised to reflect removal of I-35 as a physical and social barrier as a priority, and the range of alternatives to be analyzed include designs that allow for decks to be added over depressed sections, which could serve as parks or opportunities to serve other community needs, thus further mitigating the negative effects of past transportation and land use decisions. We also recommend the range of alternatives to be analyzed include designs that offer options to eliminate and to minimize the construction of any new elevated sections along Capital Express South and Central Projects

We thank the Commission and TxDOT staff for the commitment to this program of projects. We share the goal of maximizing the safety and effectiveness of our transportation system and appreciate your consideration of these comments.

Sincerely,

Steve Adler
Mayor

Ann Kitchen
City Council D5

Paige Ellis
City Council D8



City of Austin

**Gregorio “Greg” Casar, Council Member
District 4**

301 W. 2nd St., Austin, TX 78701
(512) 978-2104, Fax (512) 978-2114
gregorio.casar@austintexas.gov

March 23, 2021

Texas Department of Transportation
c/o Tucker Ferguson, Austin District Engineer
c/o Susan Fraser, Mobility35 Project Manager
7901 N. IH 35 Austin, Texas 78753

RE: I-35 Capital Express Project

Dear Mr. Ferguson and Ms. Fraser,

As the Austin City Council Member representing District 4, I write to ask the Texas Department of Transportation (TxDOT) to ensure the I-35 Capital Express Project meets the needs of Austin residents and not exacerbate the many harms that I-35 has historically caused. As you may be aware, I-35 cuts District 4 in half and therefore has a massive impact on the day-to-day lives of my constituents.

For decades, I-35 has been an enforcer of division. We should be working to connect our communities, instead of making that division wider. I cannot support a project that conflicts with the city’s connectivity goals and that could widen the highway unnecessarily without addressing the real traffic needs inside the city.

The City of Austin is taking important steps toward a more connected future—with the 2016 Corridor Construction Program, creating safe and accessible spaces for users of all modes, ages and abilities on major streets; with the 2018 Affordable Housing program, removing barriers to housing and access to housing; in the Austin Strategic Mobility Plan’s (ASMP) goal for a 50/50 mode share split; and with the voter approval of Project Connect, which will transform how people can safely live in and move around our city.

In stark contrast, I-35 is an unforgiving environment to people on foot, on bike, and with mobility impairments. Recently, people have been killed trying to cross I-35 on foot in my district where there are not crossings. Along the more than four and a half miles of I-35 that runs through District 4, there are only four crossings with up to a mile and a half between crossings—two of which are unsafe highway crossings themselves. This project could perpetuate these divides for generations to come. Any I-35 project in Austin should include safe crossings within at least every half-mile, anything less perpetuates safety risks and geographic division.

I support more connectivity across I-35 in the Downtown area, but we cannot settle simply for connectivity Downtown and continued divisions and safety risks in the working class parts of Austin. All multimodal bridges in our city should be sufficiently wide to provide convenience, safety and comfort to all people who use them to cross. The character of crossings, and all other



City of Austin

**Gregorio "Greg" Casar, Council Member
District 4**

301 W. 2nd St., Austin, TX 78701

(512) 978-2104, Fax (512) 978-2114

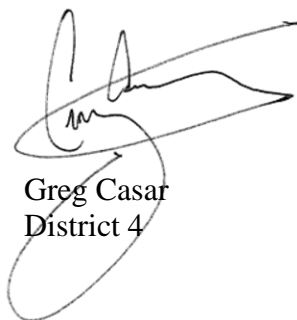
gregorio.casar@austintexas.gov

surface frontage streets, must reflect that of a growing city committed to hospitable and vibrant streets. The ASMP offers guidance for safe and prudent speeds for Urban Core Arterials and Downtown Streets. It is important that TxDOT's design speeds for all surface streets be supportive of posted speeds recommended by the ASMP. The overall cross-section of surface streets should also be context-sensitive and designed to minimize crossing distances and vehicle speeds. Safety of all users—in or out of vehicles—should be the primary concern.

We are also concerned that a flawed methodology is steering this project toward being much larger than it should be. The growth model being used for Average Annual Daily Trips (AADT) may produce unrealistic numbers that have historically far outpaced actual observed AADT increases. My office asks that TxDOT revise its methodology, specifically by acknowledging historical patterns where actual AADT counts have differed from projected counts, using observed trends in AADT rather than compounded growth models, and accounting for current capacity constraints.

This methodology, further, must be applied on a broader range of design alternatives. To date, TxDOT has provided the public with variations of the same idea—that I-35 must be expanded to twenty lanes. We reject the idea that this is the only course, and request that TxDOT provide the public with design alternatives that, among others, address operational deficiencies, update design standards, improve bicycle and pedestrian safety and support the City of Austin's mobility, equity and climate action goals without such an expansion. We know from experience, in Texas city after city, that a simple addition of lanes will not fix our traffic woes. A more connected, safe, and accessible Austin is possible, but that vision for our capital city could be severely harmed for generations if we make the wrong decisions on I-35.

Sincerely,



Greg Casar
District 4

CC: Spencer Cronk, City Manager
Robert Spillar, Director, Austin Transportation Department
Mike Trimble, Officer, Corridor Program Office

Alternatives Evaluation Criteria	Criteria Description	Evaluation Parameters	Metrics/Units
Purpose and Need	Enhancing safety for all road users within the corridor		
	Aligned with TxDOT's Road to Zero Initiative and City of Austin's Vision Zero Initiative	Supports TxDOT's mission to cut traffic fatalities in half by 2035 and then entirely by 2050. Supports the City's mission to eliminate traffic deaths and serious injuries on Austin streets.	Yes/No
	Improves emergency response time for EMS, police, fire, and hospitals	Adequate ramps, detour routes for emergency vehicles Add: Reduction in barriers for E/W emergency vehicle travel across I-35.	High/Medium/Low
	Emergency egress requirements	Tunnels will require detailed evaluations and additional design elements to meet Fire and Life Safety code requirements.	High/Medium/Low
	Reduction in people killed or seriously injured in the corridor crash rate	Review potential for crash reductions for all modes of travel	*See extended Comments addendum on suggested alternate metrics High/Medium/Low
	Addressing demand by prioritizing the movement of people, goods, and services through and across the corridor; improving operational efficiency		
	General purpose travel time	Change in travel time compared to the No Build Add: Change in person-carrying capacity for all transportation modes compared to the No Build	% Change Include and quantify changes in travel time, vehicle-miles traveled, and person-carrying capacity
	Managed lane travel time	Change in travel time compared to the No Build Add: 1) Change in person-carrying capacity for all transportation modes compared to the No Build 2) Ability of managed laned concept to address demand 3) Ability to adjust management control to respond to potential congestion travel demand (flexibility) 4) Ability of managed lane concept to provide prioritized transit operations 5) Reduces influence on central business district grid loading/unloading characteristics of I-35's existing configuration.	% Change Include and quantify changes in travel time, vehicle-miles traveled, and person-carrying capacity; numerical % change in grid congestion
	Reduction in travel demand in adjacent transportation roadway network	Change in travel demand patterns/traffic volumes and delays on adjacent roadway network Add: Amount of time to load and unload access lanes	Vehicle Miles Traveled; Time difference between alternatives and no build.
	Annual cost of delay	Cost savings from reduced delays relative to No Build; Add: Annual cost of delay per person relative to No Build	Dollars per person

Alternatives Evaluation Criteria	Criteria Description	Evaluation Parameters	Metrics/Units
Purpose and Need	Creating a more dependable and consistent route for the traveling public including bicyclists, pedestrians, emergency responders, and transit		
	Improves east-west connectivity	Enhanced vehicular, bicycle and pedestrian crossings Add: Comparison of number of protected bicycle and pedestrian crossings to No Build	High/Medium/Low Add: Net change in the number of crossings (new crossings minus removed crossings)
	Accommodates CapMetro Project Connect improvements at cross routes	Accommodates Project Connect's proposed light rail system at east- west crossings	High/Medium/Low
	Accommodates CapMetro Commuter transit routes within and across the corridor	Provides transit access at critical locations	Number of dedicated access points Number of routes served Number of Park & Ride spaces served
Feasibility, Design, and Engineering	Constructability	Construction duration, construction staging/sequencing complexity	High/Medium/Low
	Amount of new right of way (ROW) required	Acres of ROW	High/Medium/Low Acres
	Utility conflicts	Anticipated utility relocation effort	High/Medium/Low
	Drainage infrastructure complexity	Construction and maintenance of drainage infrastructure	High/Medium/Low (High = reliance on pumps; Low = gravity only)
	Opportunity and complexity of future expansion	Cost, constructability, and construction duration	High/Medium/Low
Environmental Resources	Minimize residential displacements	Travis Central Appraisal District property data, also utilize American Community Survey data like the minority/low income property displacements, and City's Affordable Housing Database	Number of Potential Displacements Number of units, number of families, # of senior residents are at risk, whether residents in affordable housing will potentially be displaced. Number of federally funded units displaced
	Minimize business displacements	Travis Central Appraisal District property data and City of Austin resources	Number of Potential Displacements, # of MBE/WBE business displacements
	Minimize minority and low income property displacements	Travis Central Appraisal District property data and American Community Survey Data	Number of Potential Displacements, Number of Potential displacements - renter and owners
	Minimize visual impacts	Quality of views from frontage road and cross streets	High/Medium/Low

Alternatives Evaluation Criteria	Criteria Description	Evaluation Parameters	Metrics/Units
Environmental Resources	Minimize Archeological site and cemetery impacts	Risk and probability of encountering or disturbing sites	High/Medium/Low
	Minimize Historic property impacts	Impacts to historic properties/districts	Number of Historic Properties and percentage of land acquired as a percentage of the tract.
	Hazardous materials	Number of potential regulated materials sites within and adjacent to the footprint	Number of Hazmat Sites
	Traffic noise	Potential to reduce noise impacts to sensitive receptors	High/Medium/Low Decibels within 500 feet of the ROW at peak hour against FHWA Noise Abatement Criteria level of 67 dB for residential (exterior) and similar sensitive receptors
	Air Quality	Reduce air quality impacts to adjacent communities	Measure Ozone and CO concentrations (ppm) and reduction of Greenhouse Gases within 500 feet of the ROW at peak hour conditions.
	Parks purchased with Land and Water Conservation Funds	Acres within footprint	Acres
	Park impacts	Acres within footprint	Acres
Local Enhancements			
	Deck Plaza Local Enhancements	Best accommodates plaza deck construction by minimized ROW needs, ease of constructability, and lower cost to City of Austin; Add: Extent to which each alternative would allow for construction of a deck between Cesar Chavez and 8th Street in downtown Austin.	High/Medium/Low
Preliminary Project Costs			
	Minimize construction cost	Preliminary construction cost estimate	Dollars
	Minimize operation and maintenance cost	Preliminary operation and maintenance cost estimate	Dollars

Addendum to Evaluation Criteria

The following includes additional context and comments from the City of Austin departments related to the Evaluation Criteria. Many comments are oriented toward future design options as the project moves forward, and we wanted to share the comments with you now to inform the developing project.

Purpose and Need

Aligned with TxDOT's Road to Zero Initiative and City of Austin's Vision Zero Initiative
Supports TxDOT's mission to cut traffic fatalities in half by 2035 and then entirely by 2050. Supports the City's mission to eliminate traffic deaths and serious injuries on Austin streets.

Comment: The City would like to see more specificity in the parameter and metrics in order to reflect the spirit of the Vision Zero and Road to Zero programs of eliminating fatal and serious-injury crashes. Ideally, the parameter would specify design considerations including:

- a minimum mainlane median height of 54 inches;
- a reduction in surface-level access to mainlanes;
- pedestrian crossings spaced no more than one half-mile apart;
- sidewalks or shared-use paths along the entire corridor;
- design speeds compliant with the safe-systems approach;
- designs forgiving of human error, so severity of injuries is minimized;
- lane widths on frontage roads compatible with a safe systems approach;
- sufficient lighting on mainlanes and frontage roads;
- sufficient shoulder space for safely situating people and vehicles after a crash; and
- sufficient access points for emergency vehicles.

The metric should then score each alternative based on how many of these considerations it meets.

Reduction in crash rate

Comment: The City of Austin is working to eliminate all fatal and serious-injury crashes from its roads, so a metric that expects crashes to be reduced — rather than eliminated — runs counter to its council-approved safety goals. Please consider using this as a parameter as an alternative safety metric:

“Reduction in people seriously injured or killed in the corridor and review potential for crash reductions.”

Emergency egress requirements

Tunnels will require detailed evaluations and additional design elements to meet Fire and Life Safety code requirements.

Comment: The City suggests the following as alternative language for this parameter:

- Reflect NFPA 502 standards for roads, tunnels, bridges, and elevated/limited access highways;
- Includes plans for improved technology to locate collisions and other incidents as well as inform best access points;

Additionally, please consider the following in the evaluation of the project design:

- Meet NFPA 502 Chapter 14 for HazMat transportation;
- Have adequate turn arounds for large public safety vehicles;
- Clearly state any proposed tunnel dimensions and ventilation plans for tunnels;

- Clearly identify shoulder locations and widths for main lanes;
- On- and off-ramps are designed to eliminate backup onto the main lanes;
- Include language about access during construction to hospitals as well as east/west connectivity across the construction areas for emergency response; and
- Consider increase in precipitation from historical norms.

Improves emergency response time for EMS, police, fire, and hospitals

Adequate ramps, detour routes for emergency vehicles

Comment: This parameter should specifically evaluate alternatives for following considerations:

- Details on adequate ingress/egress to new lanes;
- Provide large enough shoulders for emergency vehicle traffic;
- Reduction in barriers for emergency vehicle travel east and west across the project area;
- Enables ability to enforce traffic laws with limited access points and stopping areas; this includes both tunnels and HOV lanes;
- Surrounding roadways addressed to prevent secondary roadway traffic issues and congestion if mainlanes are restricted (example - 183 to IH35 access ramp);
- Includes evaluation of roadways during flood or icing events;
- Consider increases in precipitation above and beyond current models; and
- Will be built to NFPA 502 standards.

General purpose travel time

Change in travel time compared to the No Build

Comment: Please consider the following to develop an alternative parameter that emphasizes the movement of people and goods rather than vehicles.

“Change in person-carrying capacity for all transportation modes compared to the No Build:

- Are proposed capacity improvements focused primarily on reducing motor vehicle delays for peak-hour travel?
- How does this criterion ensure more people can use the corridor for the next several decades?
- How was projected population growth assumed to use the corridor? The project should not assume, plan, or facilitate additional users to continue choosing predominately single-occupancy trips and the same travel routes and same time-of-day trips.
- How might the project manage travel demand instead of simply improving vehicle throughput?”

Managed lane travel time

Change in travel time compared to the No Build

Comment: Please consider the following as an alternative parameter:

“Change in person-carrying capacity for all transportation modes compared to the No Build” and scoring the parameter on the basis of the following:

- Ability to adjust management control to respond to travel demand potentially resulting in congestion;
- Ability of managed lanes to provide prioritized transit operations;
- Ability to accommodate new pricing structure for managed lanes;
- Reduction on central business district grid loading/unloading compared to No Build; and
- Reduction in gridlock conditions”

Additionally, the City asks how do reductions to travel times and increases to person-carrying capacity compare between variable-priced managed lanes and free managed lanes? National studies can be referenced for corridors similar to IH-35 for this analysis.

Reduction in travel demand in adjacent transportation roadway network

Change in travel demand patterns/traffic volumes and delays on adjacent roadway network

Change in travel time compared to the No Build

Comment: The City has concerns about the measurement for this parameter. These relate to how the parameter will be quantified and the extent of the area of analysis. Does the analysis use traffic microsimulation or travel demand forecasting? Congestion from IH-35 impacts the City of Austin's street network a significant distance from the corridor, and it impacts people's choices where to access it. ATD recommends analysis extend one mile on both sides of the corridor.

Annual cost of delay

Cost savings from reduced delays relative to No Build

Comment: This parameter might be more effectively rearticulated as "annual cost of delay per person" to improve community engagement and address the Purpose and Need. A lay person will better understand the cost of delay per person than an abstract community-level figure. Additionally, it would reframe the analysis on moving people and goods, rather than moving vehicles since many individuals can occupy some vehicles. This metric might also be improved by factoring the total transportation cost (such the costs of owning a vehicle as compared to using transit). Please consider using a model that factors these costs into this parameter.

Improves east-west connectivity

Enhanced vehicular, bicycle and pedestrian crossings

Comment: Please consider using this language for the parameter:

"Enhanced existing and creating new vehicular, bicycle and pedestrian crossings."

I-35 is the deadliest roadway for pedestrians in Austin, and much of that is due to distance between safe crossings. As a metric for this parameter, please consider using "Is the longest distance between safe pedestrian crossings less than or equal to 1/2 mile?" as a yes or no measure. It may also be useful to break out this parameter into three, one each for motor vehicles, bicycle users, and pedestrians.

Accommodates Cap Metro Project Connect improvements at cross routes

Accommodates Project Connect's proposed light rail system at east-west crossings

Comment: Please consider changing the parameter to "Accommodates Capital Metro's **service plan** at east-west crossings." Project Connect includes not only light-rail service, but also rapid bus service connecting East Austin with the rest of the city. Moreover, many existing transit services cross I-35 and could be negatively impacted during construction and by the given alternative.

Additional criteria for Purpose and Need proposed by the City of Austin

Comment: Please consider adding the following criteria to the Purpose and Need evaluation. These criteria would likely result in the selection of an alternative that better reflects the needs of the Austin community and meets broader community support.

- **Parameter:** Person volume
Measure: Comparison of person-capacity per day to the No Build.
- **Parameter:** Person-Hours Traveled
Measure: Comparison of person-hours of travel to the No Build.
- **Parameters:** Travel times for each of the following:
 - General lanes
 - Frontage lanes
 - Managed lanes**Measure:** change in travel time compared to the No Build.
- **Parameters:** Peak period travel times for each of the following:
 - General lanes
 - Frontage lanes
 - Managed lanes**Measure:** change in travel time compared to the No Build.
- **Parameters:** Off-peak travel times for each of the following:
 - General lanes
 - Frontage lanes
 - Managed lanes**Measure:** change in travel time compared to the No Build.
- **Parameter:** Travel time variability for each of the following:
 - General lanes
 - Frontage lanes
 - Managed lanes**Measure:** 80th percentile planning time index (PT180) ratio of peak to off-peak variation in travel conditions.
- **Parameters:** Average speed for each of the following:
 - General lanes
 - Frontage lanes
 - Managed lanes**Measure:** Average system speed compared to the No Build.
- **Parameter:** Volume to capacity ratio
Measure: Comparison of levels of congestion to the No Build.
- **Parameter:** Vehicle volume
Measure: Comparison of vehicles per day to the No Build.

Feasibility, Design, and Engineering

Constructability

Construction duration, construction staging/sequencing complexity

Comment: The City is concerned about the impacts of construction to greenway and other non-motorized facilities. Please integrate impacts to greenways and other paths — including turn radii for bicycle and wheelchair users — into the measurement of this parameter.

Amount of new right of way (ROW) required

Acres of ROW

Comment: The measurement for this parameter may not take into account the relative value of ROW, such as ROW taken from parkland or cemeteries. If incursion into these areas is unavoidable, please consider weighting alternatives on the types of ROW needed, for example weighting acres from parks, cemeteries, or other culturally sensitive properties higher than ordinary ROW.

Drainage infrastructure complexity

Construction and maintenance of drainage infrastructure

Comment: Please consider in the measurement for this parameter the extent to which drainage from alternatives can be treated and improve existing water quality.

Additional criteria for Feasibility, Design, and Engineering proposed by the City of Austin

Comment: Please consider adding the following criteria to the Feasibility, Design, and Engineering evaluation. These criteria would likely result in the selection of an alternative that better reflects the needs of the Austin community and meets broader community support.

- **Parameter:** Cost of ROW required
Measure: total cost of ROW needs for each alternative
- **Parameter:** Accommodation of Green Infrastructure
Measure: acres of area available for tree planting, rain gardens, or bioswales
- **Parameter:** Navigability and User-friendliness of Alternatives
Measure: average length of sightlines to signage and exits
- **Parameter:** Disruption during construction

Environmental Resources

Minimize residential displacements

Travis Central Appraisal District property data

Comment: Please consider utilizing American Community Survey (ACS) data and City of Austin resources to identify minority and low-income property displacements. Please consider additional parameters to capture the cumulative effects of highway construction.

Minimize business displacements

Travis Central Appraisal District property data

Comment: The City has concerns about how the proposed project and its construction will affect existing small businesses. Please consider separating business owners from property owners in the analysis by using TCAD data and City of Austin resources. The parameters for analysis should also include business-owner demographics, rents, and other vulnerability factors. Please consider consulting the City's Economic Development Department to identify vulnerability factors.

Minimize minority and low-income property displacements

Travis Central Appraisal District property data and American Community Survey Data

Comment: Please consider expanding metrics used to capture minority and low-income property displacements. The City suggests including data about income, race, ethnicity, and transportation mode from ACS, City of Austin, and Travis Central Appraisal District for neighborhoods that will be affected by displacement because of this project.

Minimize visual impacts

Quality of views from frontage road and cross streets

Comment: Please consider clarifying the definitions of high- and low-quality views and how views will be evaluated.

Archeological sites and cemeteries

Risk and probability of encountering sites

Comment: The City has concerns about any impacts to municipal cemeteries that would result in relocation of existing burials. Many east-west connections are along existing watersheds, which hold a high potential for archeological resources. The city suggests revising the parameter language to: "risk and probability of encountering and disturbing sites."

Historic properties

Comment: Please consider adding metrics to assess the impact to individual historic properties. The City suggests measuring the percent of land acquired as a percentage of the tract and the increase in proximity of ROW to historic structures.

If historic structures need to be disturbed, please coordinate with the City's Parks and Recreation Department (PARC) to relocate structures to nearby parkland.

Traffic noise

Potential to reduce noise impacts

Comment: please consider the following metrics to assess the impact noise on the community:

- **Measure:** Average peak hour noise;
- **Measure:** Average traffic noise; and
- **Measure:** Average cumulative noise.

Please consider mitigating noise impacts through sound barriers and highway lids.

Parks purchased with Land and Water Conservation Funds

Acres within footprint

Comment: If parkland is required along the lake on acreage that would trigger the 6(f) process, please consider coordinating with PARD and TPWD on a mitigation plan for lost acreage.

Park impacts

Acres within footprint

Comment: The City has concerns about the potential loss of high value waterfront parkland. The City requests that waterfront parkland be considered separately from other parkland areas. The loss of waterfront parkland should be minimized, and any waterfront parkland taken should be re-created adjacent to green-stormwater infrastructure. The City does not consider stormwater infrastructure as creditable parkland acreage. Please consider adding additional metrics to capture the Urban Heat Island effect and biodiversity.

Economic Development

Comment: The City has concerns about the impact of the project on local economic development. Narrowing the I-35 footprint to retain or expand adjacent property for redevelopment would be especially important if the proposed lid or deck features must be locally funded. Please consider the following to develop evaluation criteria to quantify retention and creation of redevelopable real property adjacent to the I-35 corridor to support positive fiscal conditions for this project.

- Estimated acreage, square feet, or frontage. This may be inversely proportional to measure of displacement risk.
- Potential for deck to support buildings and allow for expansion of developable area.
- This metric could be combined with the minimization of additional ROW from business and residential property that must be subject to eminent domain.

Capitol/Protected Views

Comment: The City would like to see more specificity in the parameter by including the size and number of protected viewsheds retained.

Additional criteria for Environmental Resources proposed by the City of Austin

Comment: Please consider adding the following to the Environmental Resources evaluation. These criteria would likely result in the selection of an alternative that better reflects the needs of the Austin community and meets broader community support.

- **Parameter:** Loss of existing income-restricted affordable housing
Measure: existing number of income-restricted affordable housing
- **Parameter:** Loss of existing market-rate affordable housing
Measures: Existing rent data in the Area of Potential Effects.
- **Parameter:** Displacement of low-income, minority, and other vulnerable residents
Measure: Income, race, ethnicity, car ownership, and transportation mode data for people who will be affected by project.
- **Parameter:** long-term displacement of low-income and minority homeowners and renters
Measure: Analyze the effect of the proposed project on property taxes and how this could affect residents. Consider working with City to identify opportunities to mitigate displacement.
- **Parameter:** MBE/WBE business displacements
Measure: Business owner demographics, rent data, other vulnerability factors.
- **Parameter:** Parkland Amenity Impact
Measure: The dollar value of land, which would capture public investments, and community investment, which would take into account the value of investments into community gardens and other amenities made by communities.
- **Parameter:** Impervious cover
Measure: Amount of impervious cover to No Build.
- **Parameter:** Ecological impacts
Measure: Tree preservation, tree planting, channel erosion, water quality controls, and non-erosive natural treatment of lake shoreline.
- **Parameter:** Trees, tree canopy
Measure: Comparison of tree canopy to No Build.
- **Parameter:** Air quality
Measure: Model the potential effect on air quality for the proposed alternatives. Impact on MSAT and CO levels on adjacent communities should be evaluated.
- **Parameter:** Change in greenhouse gas emissions
Measure: Greenhouse-gas emissions models.

Local Enhancements

Deck Plaza Local Enhancements

Comment: Please consider the extent to which each alternative would allow for the construction of a deck. The placement of a deck may consider using underutilized ROW and park-deficient areas. A deck between Cesar Chavez and 8th Street in downtown Austin would allow for better activation of Palm Park and the redeveloped Convention Center Area.

Preliminary Project Costs

Minimize construction cost

Comment: Please consider building all trail connections if land is secured prior to construction. Each creek crossing will likely have a custom Limit of Construction.

Minimize operation and maintenance cost

Preliminary operation and maintenance cost estimate

Comment: Please consider the impact of climate change on soil elasticity when sizing structural elements.

Additional Operations and Maintenance criteria proposed by the City of Austin

Comment: Please consider adding the following to the cost evaluation. These criteria would likely result in the selection of an alternative that better reflects the needs of the Austin community and meets broader community support.

- **Parameter:** Caps and Stitches
Measure: Amount of ROW needed, cost of construction.
- **Parameter:** Developable ROW for other uses
Measure: Amount of ROW created for development.
- **Parameter:** Value capture for affordable housing and economic development
Measure: Potential economic development impact.