June 9, 2021

Mr. Tucker Ferguson, P.E.,
Austin District Engineer, TxDOT, and
Ms. Michelle Cooper, P.E.
I-35 Capital Express North Project, TxDOT
1608 W. 6th Street
Austin, TX 78703

RE: I-35 Capital Express North Project
Comments for Public Hearing

Dear Mr. Ferguson and Ms. Cooper:

Thank you for the opportunity to comment on the I-35 Capital Express North project. The Austin Transportation Department (ATD) appreciates the efforts of TxDOT staff on this project that would address the mobility issues within this portion of the critical I-35 corridor.

ATD, representing the mobility interests of Austin, supports the State’s plan to reconstruct this section of the I-35 Capital Express Project. We recognize that the project presents an opportunity to improve safety and mobility in North Austin and the broader region. ATD is focused on the efficient, effective, and safe movement of people, goods, and services along the I-35 Corridor. We recognize that I-35 is the economic corridor that ties Austin to the state and national economy. With this understanding, we offer the following comments for the I-35 Capital Express North Project public hearing to further advance the mobility and safety needs of the city and region on both design and future operational plans:

**Community Engagement:** The direct-connect ramps, bypass lanes, and collector-distributor lanes defined as part of the preferred alternative all represent a significant change from how the corridor presents today. Please confirm that these concepts have a thorough public vetting before assuming full support from the community and area stakeholders. Please coordinate with the City and community to fully convey the proposed connectivity across the corridor, improved safety, reduced noise impacts, and attractive aesthetics that are achieved through construction of the preferred alternative. We request on-going work with the community to consider using art and aesthetics as a point of engagement with the community, helping those most affected by the future corridor to take ownership in its design and presentation within their neighborhood.

**Multimodal Crossings:** Plans for the north segment currently propose few new east-west crossings. The City has transmitted requests to TxDOT for additional pedestrian and bicycle crossings in letters dated January 4, and January 19, 2021. Many crossings are included in the master plans...
for Urban Trails and Parks which the Austin City Council adopted in 2014 and 2019, particularly north of U.S. 290. These crossings would relieve connectivity gaps, reduce mobility barriers for lower income populations, and mitigate hot spots for pedestrian-involved crashes. The City requests continued coordination with TxDOT to ensure the design of the Capital Express North project does not preclude or complicate these proposed future crossings that may be developed subsequent to completion of the I-35 North project. A map of these proposed crossings of the Capital Express North project is attached. The Austin Transportation Department is interested in partnering with TxDOT to bring these proposed crossings to a future fruition.

**Transit Facilities:** In 2020 ATD commented on plans for the North segment that proposed a “T” ramp over IH-35 near the Tech Ridge Park-and-Ride to provide direct transit vehicle access between the managed lanes and the transit facility. TxDOT provided response at that time that they were engaged in ongoing discussions with Capital Metro to address ATD’s comments regarding merging areas between transit and non-transit vehicles and not precluding the structures needed to support this T-ramp over IH-35. ATD also communicated that the City’s North Lamar Boulevard Corridor Plan identifies a transit-only connection from northbound Lamar Boulevard to Howard Lane. At the time, TxDOT indicated that they were actively working to coordinate this connection. The latest North Segment plans provided by TxDOT to the public for the hearing show neither the proposed “T” ramp nor a connection to Howard Lane. The City requests a status update from TxDOT on how these requests are or are not incorporated into the currently preferred alternative or how they might be accommodated via future investments by the City or regional transit provider.

**HOV/HOT Managed Lanes:** The addition of the managed lane element of the preferred alternative could help the city achieve the mode-split goals enumerated in the Austin Strategic Mobility Plan (ASMP), adopted in 2019. Managed HOV lanes would make carpooling and transit use more reliable and attractive, thereby reducing demand on the region’s roadway network. Currently, TxDOT is assuming HOV operations of the managed lane additions to the corridor. The Austin Transportation Department is on record requesting that toll-management remain an option in the development of these assets. Because of demand, many HOV lanes in Texas can be seen to operate at over-subscribed conditions when occupancy requirements remain at 2+ and transit. Likewise, demand on many Texas HOV lanes is not sufficient to sustain transit and 3+ operation throughout the day. Moving the most people through the corridor while maintaining a sustainable investment is a priority for the City. ATD requests that TxDOT consider combining the operational concepts of HOV and toll management, operating the future managed lanes as HOT (HOV and Toll managed lanes). We believe this will maximize the ability of these lanes to move the most people and freight through the corridor while establishing a sustainable operational approach for the facility.

**Signalized Intersection Safety:** Signalized intersections should be designed with safe crossings for pedestrians and cyclists. Signalized intersections between frontage roads and cross streets are typically the least safe for vulnerable users due to high-speed conflicts with motor vehicles. Improvements include yield-controlled merge points enforced through innovative designs, including smart right-turn lanes and raised crosswalks. These design patterns should be the default configuration for slip lanes to improve crossing safety and comfort. The Federal Highway
Administration (FHWA) has documented the effectiveness of these designs for improving safety for vulnerable users. The City’s draft Transportation Criteria Manual also recommends the use of smart rights and raised crosswalks and we have partnered with TxDOT on installation of such designs here in the Austin District. ATD has provided design examples that illustrate this concept previously.

**Driveway Access and Reducing Conflict Points:** Driveways along frontage roads should be reduced in number and reconstructed with standardized widths, radii, and shared-use path setbacks to manage vehicle speeds, reduce length of conflict exposure, improve crossing safety and comfort, and preserve the quality of the shared-use paths. The City recommends minimizing driveway radii, allowing 10’ setbacks for the shared use path (no less than 5’), and 24’-30’ driveway throat widths to reduce pedestrian exposure and improve vulnerable user safety.

**Frontage Road Design:** Frontage roads should be designed to target speeds appropriate for our urban environment to improve safety and address multi-modal conflicts. Techniques to lower design speeds include narrowing lanes to 10 feet, use of appropriate street trees and landscaping, and on-street parking. In addition, ATD recommends high-quality shared-use paths as proscribed in the AASHTO Guide for the Development of Bicycle Facilities - Shared Use Path guidance, instead of standard narrow sidewalks, to improve pedestrian and bicyclist safety and mobility. The Austin Transportation Department is eager to partner with TxDOT on these and other appropriate techniques to humanize frontage road travel speeds.

**Local Cross Streets:** Local cross streets intersecting frontage roads at both signalized and unsignalized intersections should be constructed with standardized widths, radii, and shared-use path setbacks. These design choices would manage vehicle speeds, reduce length of conflict exposure, improve crossing safety and comfort, ensure ADA accessibility, and preserve the quality of the shared-use paths. The City’s Transportation Criteria Manual update recommends minimizing turn radii to reduce pedestrian exposures at intersections and increase the opportunity for drivers to detect the presence of vulnerable roadway users in their path. The City recommends 10 ft. setbacks of the shared-use paths (no less than 5 ft.), and cross street widths reduced to the extent possible while maintaining the appropriate number of lanes. At cross streets where slip lanes are proposed, ATD requests constructing the turn lanes as smart-rights with raised crossings for the shared-use paths to improve crossing safety and comfort.

**Next Steps:** Although the Central I-35 portion of the Capital Express project has received the most attention, each section of the corridor is critical to improving safety and for maximizing the movement of people, goods, and services through and within the Austin region. The Austin Transportation Department welcomes TxDOT’s efforts to reconstruct this corridor. We want to be your partner in this process and strive to collaborate productively with the agency to deliver a project that meets the mobility needs of the city, region, and state.

The Austin Transportation Department stands ready to assist TxDOT in achieving our combined vision for the I-35 Corridor. We recognize the importance of this corridor today, carrying somewhere between 200,000 and 300,000 vehicles per day. While I-35 is vital to our economy, the current facility is also a barrier to a safer and more connected Austin and needs replacement. The current
safety attributes of the corridor are not acceptable to our shared City and State goals of eliminating fatalities and serious injuries due to car crashes. We recognize that with replacement, we must improve the efficiency, safety, and carrying capacity of the facility, emphasizing the movement of people, goods, and services through and across the corridor, in preference to vehicle trips.

Sincerely,

Robert Spillar, P.E.,
Director, Austin Transportation Department
City of Austin

Attachment: map of these crossings for the Capital Express North project

Cc: Gina Fiandaca, Assistant City Manager
Bicycle and Pedestrian Crossings
Planned by TxDOT and *Proposed by City of Austin (COA)
IH-35 Capital Express North, Central and South Projects

Existing Crossings

- Capital Plaza Bike/Ped Bridge
- Little Walnut Creek Trail
- Powell/Rutherford Bike/Ped Bridge*
- US 183 interchange
- Huntland/Atkinson Bike/Ped Bridge
- US 290 interchange
- Capital Express North project
- Capital Express Central project
- Capital Express South project
- SH 71 interchange
- SH45 interchange
- Bergstrom Spur Trail
- Teri Rd / Colonial Park Blvd Bike/Ped Bridge*
- Williamson Creek / Pleasant Hill Creek Trail
- 41st St. / Wilshire Connection
- 5th Street Connection
- 4th Street Rail and Trail Connection
- Lady Bird Lake Crossing and Trail Connections
- Airport Blvd / Red Line Trail
- Slaughter Creek Trail
- South Boggy Creek Trail
- Onion Creek Trail
- Camino Vaquero Parkway Bike/Ped Bridge*

Crossings - Planned by TxDOT and *Proposed by COA
Existing Crossings