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May 25, 2021

Mr. Tucker Ferguson, P.E., Austin District Engineer, TxDOT, and Mr. Matthew Cho, P.E. Transportation Engineer, TxDOT 7901 N. IH 35
Austin, Texas 78753

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

Dear Mr. Ferguson and Mr. Cho:

Thank you for the opportunity to comment on the I-35 Capital Express South project. The Austin Transportation Department appreciates the efforts of TxDOT staff on this project that would improve safety and the movement of people and goods along this crucial corridor.

The Austin Transportation Department (ATD) 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 South Austin. We offer the following comments for the I-35 Capital Express South 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 aerial concepts, direct-connect ramps, bypass lanes, and collector-distributor lanes all represent a significant change from how the corridor presents today. Please assure that these concepts have a thorough public vetting before assuming full support from the community and area stakeholders. Please make sure that these design elements do not repeat the harms that similar structures through the central section of IH-35 have historically created (i.e., creating a barrier between communities of color east of I-35 and employment opportunities in Central/West Austin). The City requests TxDOT coordinate with the City and community to assure sufficient connectivity across the corridor, improved safety, reduced noise impacts, and attractive aesthetics through design and construction materials is achieved. Specifically, please 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 South segment currently propose no 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 City's adopted Urban Trails and Park master plans. These crossings would reduce connectivity gaps, remove mobility barriers for lower income populations, and mitigate hot spots for pedestrian-involved crashes. The City requests continued coordination with TxDOT to assure the design of the Capital Express South project does not preclude or complicate these proposed future crossings. A map of these proposed crossings for the Capital Express South project is attached. The Austin Transportation Department is interested in partnering with TxDOT to bring these proposed crossings to fruition.

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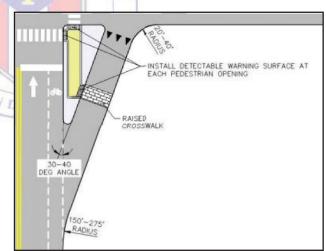
HOV/HOT Managed Lanes: The addition of managed High Occupancy Vehicle (HOV)/High Occupancy Toll (HOT) lanes could help the city achieve the mode-split goals enumerated in the Austin Strategic Mobility Plan (ASMP) adopted in 2019. Managed HOV lanes would make carpooling and transit use more attractive, 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 for 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 sub-optimal conditions when occupancy requirements remain defined as transit and 2+ vehicles only. Likewise, demand on many Texas HOV lanes is not sufficient to sustain a vehicle criterion of 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. We request TxDOT consider combining the operational concept of HOV and toll management, operating the future managed lanes as HOT (HOV and Toll managed lanes).

Transit Access: Transit access between the managed lanes and critical intermodal transit facilities, transit stations, park-and-ride facilities, and primary destinations is critical to meeting Austin's adopted goal of achieving a 50/50 modal split by 2030 per the Austin Strategic Mobility Plan. The City, along with Capital Metro is evaluating opportunities to construct a park-and-ride facility near Slaughter Lane and Ralph Ablanedo Dr., adjacent IH-35. ATD provided TxDOT this information in our previous comments for the South project, and Project Connect has included this facility in its 15% design plans for the Orange Line. TxDOT's latest South project plans do not include this facility and the City again requests TxDOT continue to work with Capital Metro and the City to either provide this direct transit connection or preserve the ability to accommodate it as Project Connect is constructed.

Signalized Intersection Safety: Signalized intersections should be designed with safe crossings for pedestrians and bicyclists.

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.

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.

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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 frontage road lanes to 10 feet, providing high-quality shared-use paths instead of standard narrow sidewalks, use of appropriate street trees and landscaping, and allowing on-street parking. The Austin Transportation Department is eager to partner with TxDOT on these and other appropriate techniques to humanize frontage road travel speeds and effectively operate grid-level assets.

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' setbacks of the shared-use paths (no less than 5'), and cross street widths reduced to the extent possible while maintaining the appropriate number of lanes. At cross street intersections where slip lanes are proposed, Austin Transportation 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 the movement of people, goods and services through and within the Austin region. The City of Austin welcomes TxDOT's efforts to improve this corridor and strives 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 this grand 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 it is vital to our economy, it 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 achieving our shared Vision Zero goals (eliminating fatalities and serious injuries due to mobility 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

Cc: Gina Fiandaca, Assistant City Manager

Northern Walnut Creek Trail **Bicycle and Pedestrian Crossings** Planned by TxDOT and *Proposed by City of Austin (COA) IH-35 Capital Express North, Central and South Projects Middle Fiskville Bike/Ped Bridge* Little Walnut Creek Trail Powell/Rutherford Bike/Ped Bridge* US 183 interchange Capital Express Huntland/Atkinson Bike/Ped Bridge North project US 290 interchange Capital Plaza Bike/Ped Bridge Airport Blvd / Red Line Trail 41st St. / Wilshire Connection **Capital Express** Central project , 5th Street Connection 4th Street Rail and Trail Connection Lady Bird Lake Crossing and Trail Connections Capital Express South project SH 71 interchange Bergstrom Spur Trail Teri Rd / Colonial Park Blvd Bike/Ped Bridge* Williamson Creek / Pleasant Hill Creek Trail South Boggy Creek Trail Slaughter Creek Trail Onion Creek Trail Crossings - Planned by TxDOT and *Proposed by COA **Existing Crossings** Camino Vaquero Parkway Bike/Ped Bridge* 1.25 2.5 5 Miles SH45 interchange