Agency Scoping Meeting #1

Project Location
Travis County

I-35 Capital Express Central Project
0015-13-388

Project Limits
I-35 from US 290 East to SH 71/Ben White Boulevard

Meeting Location
Virtual meeting

Meeting Date and Time
Nov. 12, 2020 2-4 p.m.

Presenters
Susan Fraser, P.E., Mobility35 Program Manager, TxDOT
Shane Valentine, I-35 Capital Express Central Environmental Lead, HDR

Total Number of Attendees (approx.)
52

Total Number of Commenters
109

Contents

A. Comments Received from Agencies

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 capacity[1] 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 then 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.

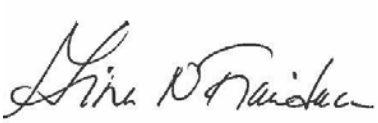
City of Austin Commitment to the I-35 Capital Express Project

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

I-35 Capital Express Central - City of Austin Comments

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1	Draft Purpose and Need	Page 3, Section 2.1 Design Standards	CoA-Austin Transportation Department (ATD)	ATD has concerns about the design standards (Design standards, Page 3, Section 2.1 Design Standards). The study indicates that there is a need to address design standards because the current freeway does not meet AASHTO 2018 or TMUTCD 2011 Guidelines. While this is true, the Statement of Need should acknowledge that the facility is in an extremely constrained urban corridor, and as such should be designed according to the context this environment provides using alternative context sensitive design standards as allowed under both the AASHTO and TMUTCD Standards. Maximum effort should be afforded to avoiding, minimizing, and mitigating impacts to the natural and urban built environment. Insert the following language: The Austin Strategic Mobility Plan identifies multiple policies the should guide the design of this constrained urban corridor to avoid, minimize, and mitigate impacts to the natural and urban built environment. These include: Roadway System Policy 5, "manage right of way space for all users," Land and Ecology Policy 1 "avoid, minimize and mitigate adverse impacts of the transportation network on natural and cultural resources," and Land and Ecology Policy 2 "pursue designs that enhance our ecosystem."
2	Draft Purpose and Need	Section 3	CoA-Austin Transportation Department (ATD)	ATD has concerns that Section 3 is too brief and does not cover all of the project's purpose. To more accurately capture the project's purpose please insert the following thoughts: -insert "local" between "critical" and "regional" -I-35 occupies a lot of area in dense urban space. The highway's design must acknowledge the limited space and multiple neighborhoods, uses, and modes that immediately surround the project, especially in Downtown Austin. The design of the project should support Austin Strategic Mobility Plan Land Use Policy 3 "create places that encourage travel choice and are connected." The Austin Strategic Mobility Plan notes that the role of the transportation network is to "do more than just facilitate travel from one place to another," and that any "regulation and redesign" of our transportation network" must consider how communities interact with the transportation network. The design should also adhere to Austin Strategic Mobility Plan Land Use Policy 5 "make streets great places."
3	Draft Purpose and Need		CoA-Austin Transportation Department (ATD)	It is critical that the need for the project includes how the north-south connections provided by I-35 affect the lack of east-west connections in Austin. The Austin Strategic Mobility Plan recognizes the importance of east-west connectivity in addition to the north-south connectivity of I-35. Please insert the following discussion: As the primary north-south corridor in the region, I-35 not only affects north-south travel, but also east-west travel. The Austin Strategic Mobility Plan explicitly notes that due to the construction and design of I-35 "those traveling east/west [are] without adequate connections." Travel demand to cross I-35 will continue to exist due to land use and housing capacity limitations within the city of Austin and Travis County. Including these connections will support Roadway Policy 1 of the Austin Strategic Mobility Plan, which aims to "identify and develop projects that, while helping meet our mode share goals, increase vehicle capacity on our roadway system at strategic locations to manage congestion and facilitate emergency response, across a range of travel directions and distances, and prioritize connectivity of our streets for the common public good." East-west connections are especially important where I-35 interacts with our Vehicle, Transit, and Bicycle Priority Networks. In Capital Express Central, the Vehicle Priority Network intersects with or crosses I-35 at 51st St, 45th St, 38th St, MLK Jr. Blvd, 15th St, 11th St, 8th St, 7th St, 6th St, 5th St, Cesar Chavez St, Riverside Dr, Oltorf St, Ben White Blvd, as I-35 is adjacent to the terminus of Cameron Rd. "Complete the Bicycle Priority Network" is Bicycle System Policy 2 in the Austin Strategic Mobility Plan. Lane, 51st St, 10th St, 6th St, 5th St, 4th St, Airport Blvd, Clarkson Ave, Wilshire Blvd, 38 1/2 St, 32nd St, Dean Keeton St, Clyde Littlefield Dr, MLK Jr. Blvd, 12th St, 10th St, 6th St, 5th St, 4th St, River St/Holly St, Riverside Dr, Woodland Ave, Oltorf St, and Woodward St. The Transit Priority Network intersects, crosses, or is adjacent to I-35 at 51st St, Cameron Rd, Airport Blvd, Clarkson Ave, 41st St, 38 1/2 St, Dean Keaton St, MLK Blvd, 11th St, 7th St, Cesar Chavez Ave, Riverside Dr, and Oltorf St. Capital Metro's Red Line and future Green Line also cross I-35 at 4th St.
4	Draft Purpose and Need	Section 2.2	CoA-Austin Transportation Department (ATD)	ATD believes the need for the project should be reframed to emphasize the carrying capacity of the roadway and reflect City of Austin policy. Rephrase Section 2.2 to note that the issue with flow and operations should focus on how to most efficiently move people and goods, as opposed to future travel demand or growth projections. Stating the need in terms of only vehicle congestion and vehicle travel times prematurely eliminates viable alternatives and skews the outcome of the NEPA process. Focusing on moving people and goods efficiently and increasing the person-carrying capacity of the highway aligns with the Austin Strategic Mobility Plan's Roadway System Policy 2: "increase the person-carrying capacity of the highway system," as well as Goods Movement Policies 1 and 2 "support reliable freight operations and efficient goods movement through, into, and out of Austin" and "recognize, plan for, and mitigate impacts of goods movement." Highway improvements that carry more people through managed capacity, and well as improved accommodations for bicyclists, pedestrians, and other users will maximize the number of people and goods that are able to flow through the corridor.

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

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

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

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

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39	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	Provide safe crossing of pedestrians and bicyclists at signalized intersections along the frontage roads. Where a channelized right-turn lane is absolutely necessary for capacity, a "smart right" design should be used. TxDOT has developed its own guidelines for application through a research study with the University of Texas Center for Transportation Research at https://library.ctr.utexas.edu/Presto/content/Detail.aspx?ctID=UmVzZWFyY2gtaW4tUHJvZ3Jlc3NfMTExMjY=&rID=NzU=&ssid=c2NyZWVuSURfMTgxMTY. Raised pedestrian crossings should be incorporated to slow vehicle speeds and improve yielding compliance by drivers crossing paths with pedestrians and cyclists. All channelized right-turn lanes should be configured with yield control and no acceleration lanes to enter the frontage roads. City of Austin collaborated with TxDOT to fund, design, and construct raised crosswalks and/or reconfigured channelized right-turn lanes on TxDOT streets as safety improvements at Martin Luther King Jr. Blvd/IH-35 Frontage Roads and Lamar Blvd/Parmer Ln. These examples should be the template for signalized intersections along IH-35.
40	Range of Alternatives Draft Technical report	Public Presentation	CoA-Austin Transportation Department (ATD)	Will frontage road driveways be reconstructed? Is driveway consolidation being considered? What are the planned radii at these driveways? Radii will affect how the pedestrians and bicyclists maneuver along sidewalks and shared-use paths (SUP) at these driveways. The CTRMA 183 S project shared-use path is a good example of how large driveway radii can degrade an otherwise great shared use path. The City of Austin recommends having a standardized width, radius, and SUP setback for driveways to manage vehicle speeds, length of exposure, and crossing safety and comfort. Propose 15' radius, desired 10' setback (no less than 5') and a typical 24-30' throat width. Overly wide driveways should be tightened.
41	Range of Alternatives Draft Technical report	Public Presentation - Slide 22	CoA-Austin Transportation Department (ATD)	Please use an x-axis that is to-scale for the years 2018 through 2045. The way it appears now makes it look like the forecasted population growth is increasing at a greater rate than what has historically occurred from 1980 through 2018.
42	Range of Alternatives Draft Technical report		COA-Police Department	It is very difficult for APD to give truly informed feedback based on the limited information that we have on the project. We have seen artist renderings but there are no dimensions on the project, especially with height and width to the proposed roadways and tunnels. We were in agreement that we would like to stay away from tunnels if no other alternative can be made to achieve the safety and mobility purpose and need of the project. The tunnels are a potential barrier to public safety and first responder access to emergency scenes within them if not designed to the latest accepted safety standards, such as NFPA 502. Out of the proposed build alternatives, we liked Build Alternative 2 the most, with the managed lanes lowered, as our first choice. This would eliminate any tunnels and allow easier access to emergency personnel. If the tunnel system is used there will need to be extensive unified training on responding to various incidents that could occur inside the tunnel(s). This training would need to commence prior to the tunnel system coming on line. Some of the issues that we forecast to happen are as follows: •What type of barriers will be used to separate northbound and southbound lanes, and the managed lanes from the main lanes? This will assist in helping us evaluate how or where we will be able to enter to access a crash event, and hopefully prevent some secondary crashes. •Will there be access points for emergency vehicles only to cross medians without having to exit and work back to a scene fighting traffic? •What type and where are the pedestrian crossings? For any of the three options there should be barriers to prevent pedestrian access to the main thoroughfare to stop the issues we currently see in pedestrian attempts to run across I35. •Accessibility to the roadways in the new project. If tunnels are built, how would emergency vehicles access a crash scene? Would there be emergency on or off ramps to get vehicles out of the tunnel? What would the shoulders of the roadway look like? Depending on the length of the tunnels in the project there could be several miles of vehicles trapped inside the tunnel. •When a major crash scene happens, such as an overturned 18 wheeler, would there be enough room to get large wreckers in to remove vehicles involved? Booms on heavy duty wreckers can reach up to 30 feet above the wrecker, which would require at least 60 feet of height inside the tunnel. •Would TxDOT allow HAZMAT vehicles inside the enclosed tunnels? Currently there is no HAZMAT route around Austin, but the City of Austin and TxDOT anticipate adopting a hazardous materials route in 2021 that would divert this cargo off IH-35. If those vehicles are allowed to travel inside the tunnel there would be additional safety concerns. •Would the tunnels be ventilated enough with a major crash scene? Fire in an enclosed space, along with carbon monoxide from idling vehicles would potentially be a hazard to first responders. Would officers have the required PPE to enter a scene and be safe doing so? •Fatal crash scenes would be impacted within tunnels. Tunnel heights would need to be near 100 feet to be able to continue to use unmanned aerial vehicles (UAV) to document the scenes. There are other alternatives to UAV's but that is what is currently being used with the most success at developing a quality image in the shortest amount of time to reopen the roadways. •Hospital access – with Dell Seton and Dell Children's being major trauma hospitals, it is important to maintain access to these centers with all the construction. St. David's is also on this corridor. •Patrol access – east & west movement would need to be maintained to allow patrol officers to traverse the city for timely 911 response.
43	Range of Alternatives Draft Technical report		Austin-Travis County Emergency Medical Services	Please ensure that the project will have shoulder access or width for the ability to manage accidents without being in the primary lanes of traffic.

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

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

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

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

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78	Range of Alternatives Draft Technical report	All	COA-Housing and Planning Department (HPD)	HPD has concerns about the raised lanes in Alternative 3, but supports Alternative 2. The typical sections of Alternative 3 include raised managed lanes - although these don't exist the full extent of the project, they would perpetuate the physical barrier of existing raised lanes. Alternative 1 and 2 do not include raised lanes, but Alternative 2 offers the advantage of a simpler design (mostly at one grade) for nearly the entire extent of the project, meaning that any successful cap design could be more easily replicated in the future.
79	Range-of-Alternatives-Draft-Technical-Report	4	COA-Housing and Planning Department (HPD)	The third alternative creates an overpass over Airport which is in conflict with the agreed upon goal to remove the upper decks. This will continue to produce negative noise impacts and will not improve the aesthetic and visual quality of the area.
80	Range of Alternatives Draft Technical report	4	COA-Housing and Planning Department (HPD)	Which alternatives will require acquiring and clearing additional property? For each alternative, consider impacts of acquiring and clearing additional property as part of EIS analysis.
81	Range of Alternatives Draft Technical report	Environmental Constraints Map	COA-Housing and Planning Department (HPD)	HPD requests that TxDOT include previous research that is relevant to the project in the project record. Two additional historic resources surveys should be referenced in determining known historic properties along the Interstate-35 corridor. The East Austin Historic Survey (HHM & Associates, 2016) covers the area east of I-35 from Lady Bird Lake to Manor Road. The Historic Resources Survey of North Loop, Hancock, and Upper Boggy Creek (Cox McLain Environmental Consulting, 2020/2021) includes both sides of the interstate from E. Dean Keeton St. to the Mueller development, then continues on the west side to 2222. The results of the East Austin survey are available athttps://www.austintexas.gov/page/east-austin-historic-survey. The results of the North Loop, Hancock, and Upper Boggy Creek survey remain in draft form; the City of Austin Historic Preservation Office will provide draft results upon request, or once finalized, the results will be posted to https://www.austintexas.gov/page/current-projects.
82	Range of Alternatives Draft Technical report	Environmental Constraints Map	COA-Housing and Planning Department (HPD)	HPD requests that TxDOT reference locally designated historic districts. The Robertson/Stuart & Mair Historic District is within the area included on the Environmental Constraints Map. Please reference the Historic Property Viewer at https://austin.maps.arcgis.com/apps/webappviewer/index.html?id=5251cd8ad3534754ad9a3d6a222c68ec.
83	Range of Alternatives Draft Technical report	Capital-Express-Central-Typical-Sections	COA-Housing and Planning Department (HPD)	HPD has concerns about what is being proposed at Lady Bird Lake and the clarity of the graphics and text related to this area. It is difficult to understand from the sections provided what is being proposed at/above or below Lady Bird Lake. Please provide sections that will show the water level and illustrate the transition conditions where the land and water meet. In each Alternative it is stated that reconstruction/revisions will be made to the bridge over the lake but it is not clear what those are. In this and other provided documents there is little mention of studies/concern for the riparian areas and the natural and social systems that will be affected at the edges of the lake.
84	Range of Alternatives Draft Technical report	Public Presentation slides 35-40	COA-Housing and Planning Department (HPD)	HPD has concerns about the clarity of the drawings. It is difficult to differentiate between the Build Alternatives without close study and a passing familiarity with engineering sections. We suggest a bird's-eye view and "fly-through" simulation of each alternative to better help people understand what is being proposed.
85	Range of Alternatives Draft Technical report	All	COA-Office of Sustainability	The Office of Sustainability has concerns regarding the I35 project in relation to the City's ability to meet City Council Strategic Direction 2023 goals and goals stated in the as well as goals of the Smart Mobility Roadmap, Watershed Protection Masterplan and the City's Climate Resilience Action Plan. The need for resilience to extreme weather events and changing climate conditions is now strikingly evident with ongoing and repeated events in Austin, such as extreme heat, drought, flooding, and wildfires. The Office of Sustainability asks TXDOT to conduct a vulnerability assessment of climate change impacts, infrastructure exposure and sensitivity to climate change, and how to incorporate climate change considerations into infrastructure project delivery, using the Central Texas Extreme Weather and Climate Change Vulnerability Assessment of Regional Transportation Infrastructure as a guideline for the assessment. As part of this effort, we ask TXDOT to conduct a Greenhouse Gas Emissions analysis and enact mitigation strategies. In order to reduce emissions associated with the use phase of the project, the Office of Sustainability requests for TXDOT to work with the Austin Energy Plug-In Everywhere Program and nonprofit TXetra to develop an Alternative Fuel Corridor Plan as part of the redevelopment - also See Texas River Cities Plug-In Infrastructure Plan for guidance. This comment is supported by the following city policies: •SD23: Health & Environment - Climate Change and Resilience HE.E.5a-5c. •SD23: Safety - Quality and Reliability of Critical Infrastructure S.E.2. and S.E.3 •SD23: Health & Environment - Climate Change and Resilience HE.E.1. and HE.E.3. •City Council Resolution No. 20200409-040 WUI code •Watershed Protection Master Plan + Atlas 14 •City Council Resolution No. 20131121-060, Response to Council •Climate Resilience Action Plan for City Assets and Operations. •City Council Resolution No. 20140410-024 •City Council Resolution 20170302-039 & Resolution-AI-2017-463 - Creation of a Smart Mobility Roadmap

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

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

BOARD/COMMISSION RECOMMENDATION

Urban Transportation Commission

Recommendation Number 20201216-02A: [I-35 Capital Express Scoping]

CLIMATE:
WHEREAS, the City of Austin faces a Climate Catastrophe if we do not act in a concerted way to fundamentally change how we plan our cities, prioritize money and resources away from fossil-fuel vehicles and continued highway construction and toward Active Transportation, such as biking, walking, rolling, and other climate-friendly micro-mobility options, and High-Capacity Transit;

WHEREAS, the Austin Strategic Mobility plan calls for Austin to reach a goal of 50% of Austinites commuting by walking, biking, transit, or any other non-drive-alone mode by 2039, from today's current 24% of Austinites using non-drive-alone modes;

WHEREAS, the City of Austin can strengthen its efforts to reduce carbon emissions, improve air quality and its citizens' health by building a more equitable high-capacity transit network;

SAFETY:
WHEREAS, people walking, biking and using micro-mobility devices have been killed or seriously injured on or along Interstate Highway 35 (I-35) in Austin, disproportionately affecting people of color, individuals experiencing homelessness, and other marginalized communities;

WHEREAS, the Austin Strategic Mobility Plan further reaffirms the Vision Zero goal the City of Austin set in 2016, to reach zero traffic fatalities by 2025;

WHEREAS, the Texas Transportation Commission has set a goal of zero traffic fatalities by 2050 and cutting deaths in half by 2035;

WHEREAS, Cap Metro's transit service currently releases passengers near I-35 frontage roads, leaving them to make east-west connections across IH-35 or along the frontage road via whatever means of transport they have available, most often by foot or bicycle;

WHEREAS, the City's 2014 Bicycle Master Plan envisions a core network of safe facilities suitable for people of all ages and abilities, and approximately three-quarters of the streets that cross this project corridor have been identified as being in the Bicycle Priority Network;

EQUITY:
WHEREAS, the original siting and construction of I-35 through Austin was a directed, intentional project to physically enforce racial segregation;

WHEREAS, the City, County, TXDOT, and the Capital Area Metropolitan Planning Organization have an obligation to consider past inequities and disproportionate impacts of project alternatives and mitigate negative impacts through equitable planning processes and outcomes;

WHEREAS, a depressed, below-grade highway with a lid designed to support human-scaled activity offers a once-in-a-generation opportunity to physically reconnect East Austin in a direct effort to partially mitigate the negative impacts of decades of structural racism and inequitable highway and city-planning projects;

HIGH CAPACITY TRANSIT:
WHEREAS, in November 2020 Austin voters passed a Project Connect tax district which will fund and construct a generational, comprehensive portfolio of transit projects;

WHEREAS, despite the successful passage of Project Connect, TxDOT I-35 Capital Express Central Project proposes to add two non-tolled managed lanes in each direction to I-35 through central Austin, between US 290 East and SH 71/Ben White Boulevard, growing to 20 total lanes in some segments of the highway;

WHEREAS, the Orange Line light rail corridor included in Project Connect essentially runs parallel to I-35, while also taking people more directly to their homes, jobs, and a variety of safe, walkable, bikeable, rollable destinations;

WHEREAS, the Orange Line light rail corridor can therefore serve as a better alternative for I-35 commuters, particularly if the delivery of later phases of the project (such as the northern segment to Tech Ridge Park and Ride) are accelerated by additional funding;

THEREFORE,
BE IT RESOLVED, the Urban Transportation Commission urges TxDOT in the strongest possible way to not widen I-35 in the I-35 Capital Express project.

BE IT RESOLVED, the Urban Transportation Commission recommends TxDOT work with the City of Austin to prioritize

- reducing the scope of the TxDOT I-35 Capital Express, while meeting safety, movement, and maintenance requirements,

- adding no additional width for highway or service road car lanes, while allowing for high-capacity-friendly managed lanes
- Designing service roads to operate as local streets, with context appropriate design speeds and prioritization of active transportation crossings
- Adding overall width solely to build safe, dedicated, all-ages, all-ability infrastructure to enable people not in cars to humanely travel along and across the I-35 corridor
- minimizing negative climate impacts
- preventing race-based and income-based inequities in planning and during construction

BE IT FURTHER RESOLVED, the UTC recommends TxDOT I-35 Capital Express Central Project be designed and developed to allow a “Cut and Cap” (or “Lidding”) option with wide bridges designed to prioritize human-centered activity and active transportation;

BE IT FURTHER RESOLVED, the UTC recommends TxDOT to explore providing additional funding to Project Connect as an alternative to highway expansion, in particular, funding the northern segment of the Orange line from the Tech Ridge Park and Ride to US 183;

BE IT FURTHER RESOLVED, the UTC recommends TxDOT prioritize and pay for all high-capacity transit infrastructure, such as dedicated ramps and stations, as determined necessary by Capital Metro.

BE IT FURTHER RESOLVED, the UTC recommends TxDOT incorporate into the Project Purpose and Need the City of Austin plans and goals, to wit, but not limited to, the Austin Strategic Mobility Plan, Street Design Guide, City of Austin Vision Zero goals, Imagine Austin Comprehensive Plan, and the Austin Climate Equity plan;

BE IT FURTHER RESOLVED, the UTC recommends TxDOT undertake a Transportation Demand Management study for the I-35 Capital Express project area and the impacted localities to identify system-wide strategies for reducing VMT through reallocation of funds for regional transit, active transportation and local connectivity.

Date of Approval: 12/17/20

Record of the vote: 7-0

Attest: Kaycie Alexander

Pedestrian Advisory Council (PAC) Recommendation:

Active Mobility Recommendations for Texas Department of Transportation IH-35 Capital Express Project

WHEREAS, the Pedestrian Advisory Council (PAC) advises the City of Austin on pedestrian planning, policy, design, funding, education, and enforcement efforts regarding the creation, maintenance, and operation of pedestrian facilities in order to ensure a safe and enjoyable circulation for both commuting and recreation within the City of Austin;

WHEREAS, the purpose of the Bicycle Advisory Council (BAC) is to advise the City of Austin and other jurisdictions on all matters relating to the use of the bicycle, bicycle infrastructure, and individuals of all ages and abilities who utilize bicycles;

WHEREAS, the City's 2014 Bicycle Master Plan envisions a core network of safe facilities suitable for people of all ages and abilities, and approximately three-quarters of the streets that cross this project corridor have been identified as being in the Bicycle Priority Network;

WHEREAS, the City's Sidewalk / ADA Transition Plan accounts for missing and broken sidewalks citywide, including significant very high priority missing and broken sidewalks along the project corridor and TXDOT has adopted a renewed focus on sidewalks and building an inclusive, accessible transportation system for all users;

WHEREAS, the Austin Strategic Mobility Plan (ASMP) calls for a reduction in the percentage of single occupancy trips to 50% by 2039;

WHEREAS, the High-Injury Network (HIN) identifies streets in Austin that are under City of Austin jurisdiction that has a relatively high number of serious injuries and fatal crashes, and 12 of the streets which cross this project corridor are included therein;

WHEREAS, the City's Vision Zero Plan calls for intersection improvements, raised crosswalks, signal upgrades, design modifications to major streets and other measures aimed at ending the needless deaths and injuries occurring on Austin roads every year;

WHEREAS, a significant number of people who were walking or riding bicycles or micromobility devices have been killed or seriously injured on or along Interstate Highway 35 (I-35) in Austin;

WHEREAS, the impact of these serious injuries and fatalities have been inequitable, disproportionately affecting people of color, individuals experiencing homelessness, and other marginalized communities;

WHEREAS, Cap Metro's transit service currently releases passengers near I-35 frontage roads, leaving them to make east-west connections across IH-35 or along the frontage road via whatever means of transport they have available, most often by foot or bicycle;

WHEREAS, the Purpose and Need document of the TxDOT I-35 Capital Express Central Project clearly states, "there is a need to provide safer and more continuous accommodations for bicyclists and pedestrians" (within the project corridor);

WHEREAS, the first stated goal of the TxDOT I-35 Capital Express Central Project is to "enhance safety," however, significantly more energy and materials within the Virtual Public Meeting from 11/12/20 is spent describing current travel time issues than current safety issues, despite safety issues resulting in a profound loss of life;

WHEREAS, National Association of City Transportation Officials (NACTO) guidelines for all ages & abilities bicycle facilities state bicycles should be separated from pedestrians where significant volume of either mode is present and American Association of State Highway Transportation Officials (AASHTO) guidelines state "segregation of pedestrians from wheeled [e.g. bicyclists] users may be appropriate";

WHEREAS, there will be high enough pedestrian volume throughout the project corridor to warrant that the walkway and bikeway are separate from each other;

WHEREAS, the Red Line Trail and Parkway are projected to have over 10,000 daily users at both crossings of I-35 upon completion circa 2030;

WHEREAS, TxDOT recognizes the "local and regional importance of the proposed I-35 Capital Express Central Project," and espouses to "encourage the participation of all interested stakeholders," but the originally proposed 30 day deadline for public comments on the Draft coordination plan and schedule, Draft project purpose and need, and the Draft range of alternatives is unduly inadequate for many interested stakeholder groups which convene only once per month;

WHEREAS, the City, County, TXDOT, and the Capital Area Metropolitan Planning Organization have an obligation to consider past inequities and potential disproportionate impacts of project alternatives and mitigate negative impacts through equitable planning processes and outcomes;

NOW THEREFORE, BE IT RESOLVED, the PAC and the BAC recommend that safety for all road users be prioritized above all other considerations during the design and implementation of the I-35 Capital Express Central Project, and that language reflecting this be added explicitly to the Purpose and Need clearly indicated as a higher priority than congestion;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT prioritize safe, all ages and abilities east-west connectivity across and along the I-35 corridor;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend the implementation of protected all ages & abilities high comfort bikeways which are separated from both motor vehicle lanes and pedestrian sidewalks along the entire project corridor;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend project elements (aside from the controlled access facilities) should be designed and operated as multimodal city streets using target speeds, design speeds, and posted speeds of 30 mph or less in accordance with NACTO and City of Austin design guidelines, including sufficient safety lighting for all users;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend all controlled access facilities should be designed with modern design guidance, including the most recent AASHTO Green Book, using target speeds, design speeds, and posted speeds appropriate for a dense urban context and to allow seamless and safe integration with a safe, multimodal urban street grid;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend TxDOT commit to a full and honest consideration of alternatives to the current proposed design, up to and including fully burying the highway through downtown or dismantling and re-designating I-35 along another existing highway, e.g. US 183 or SH 130, to enable the City of Austin to reconnect its street grid and repair the divide that presently separates it;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend TxDOT consider alternatives proposed by Our Future 35, Reconnect Austin, and Rethink35 in furtherance of this goal;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend minimal implementation of slip lanes and that any slip lanes in this corridor should be designed with tight tolerances and clear sight lines to crossing walkways and bikeways that slow right turns to improve safety for people crossing those slip lanes, and that crossings be raised;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that any I-35 roadway lanes, i.e. both main lanes and frontage road lanes (street lanes), go below the Red Line Parkway at both Red Line crossings, i.e. next to 4th St. and near 43rd St.;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that the Airport Blvd. intersection configuration take into consideration a future Hancock transit station for the Gold Line and/or the Red Line by creating a superior pedestrian and bicycling crossing, including putting the intersection of Airport Blvd. and I-35 frontage road (street lanes) underground and providing plaza, park, and buildings opportunities on the surface;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT and the City of Austin mutually pursue an interlocal agreement for implementation of surface-level improvements that are not within the direct purview of TxDOT, e.g. caps and real estate value capture;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT consider utilizing pedestrian scramble phases at intersections with high pedestrian volumes;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend TxDOT allow 90 days of public input after the publication of technical reports and other relevant project documentation for all public comment periods for the remainder of the environmental process;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT provide $500 million for pedestrian and bicycling improvements to local streets and trails within 3-5 miles of the project in order to mitigate the negative consequences of additional motor vehicle traffic on local streets caused by any additional motor vehicle capacity of the proposed project;

BE IT FURTHER RESOLVED, the PAC and the BAC request that Austin City Council actively engage in every phase of the TXDOT environmental process for I-35 central and incorporate these recommendations and those of other community groups into their own comments as appropriate;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT provide $650 million for facilitating construction of affordable housing and support programs for people experiencing homelessness on I-35 and Austinites displaced, or in danger of being displaced along the corridor;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT adds to the Project Purpose and Need to align with local plans and goals, including, but not limited to, the Austin Strategic Mobility Plan, Street Design Guide, City of Austin Vision Zero goals, Imagine Austin Comprehensive Plan, and the Austin Climate Equity plan;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT design bike-ped crossings to be safe for vulnerable road users, especially in areas where a drivers' attention is primarily focused on merging with traffic;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT create effective wayfinding systems to provide well-structured directions for people walking and biking. These would have distances to key destinations, as well as estimated time to bike or walk to those destinations;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT provide bicycle and pedestrian infrastructure like street furniture, water fountains, and tree plantings to increase economic activity, improve environmental quality, and provide shade. Trees should be between fast-moving cars and people to add safety and comfort for vulnerable road users.

Date of Approval: December 7, 2020

Vote: 7-0, with Stratton and Bauereis absent.

Attest:

Adam Greenfield, Chair, Pedestrian Advisory Council

Bicycle Advisory Council (BAC) Recommendation:

<u>Active Mobility Recommendations for Texas Department of Transportation IH-35 Capital Express Project</u>

WHEREAS, the Bicycle Advisory Council (BAC) advises the City of Austin and other jurisdictions on all matters relating to the use of the bicycle, bicycle infrastructure, and individuals of all ages and abilities who utilize bicycles; and

WHEREAS, the purpose of the Pedestrian Advisory Council (PAC) is to advise the City of Austin on pedestrian planning, policy, design, funding, education, and enforcement efforts regarding the creation, maintenance, and operation of pedestrian facilities in order to ensure a safe and enjoyable circulation for both commuting and recreation within the City of Austin;

WHEREAS, the City's 2014 Bicycle Master Plan envisions a core network of safe facilities suitable for people of all ages and abilities, and approximately three-quarters of the streets that cross this project corridor have been identified as being in the Bicycle Priority Network;

WHEREAS, the City's Sidewalk / ADA Transition Plan accounts for missing and broken sidewalks citywide, including significant very high priority missing and broken sidewalks along the project corridor and TXDOT has adopted a renewed focus on sidewalks and building an inclusive, accessible transportation system for all users;

WHEREAS, the Austin Strategic Mobility Plan (ASMP) calls for a reduction in the percentage of single occupancy trips to 50% by 2039;

WHEREAS, the High-Injury Network (HIN) identifies streets in Austin that are under City of Austin jurisdiction that has a relatively high number of serious injuries and fatal crashes, and 12 of the streets which cross this project corridor are included therein;

WHEREAS, the City's Vision Zero Plan calls for intersection improvements, raised crosswalks, signal upgrades, design modifications to major streets and other measures aimed at ending the needless deaths and injuries occurring on Austin roads every year;

WHEREAS, a significant number of people who were walking or riding bicycles or micromobility devices have been killed or seriously injured on or along Interstate Highway 35 (I-35) in Austin;

WHEREAS, the impact of these serious injuries and fatalities have been inequitable, disproportionately affecting people of color, individuals experiencing homelessness, and other marginalized communities;

WHEREAS, Cap Metro's transit service currently releases passengers near I-35 frontage roads, leaving them to make east-west connections across IH-35 or along the frontage road via whatever means of transport they have available, most often by foot or bicycle;

WHEREAS, the Purpose and Need document of the TxDOT I-35 Capital Express Central Project clearly states, "there is a need to provide safer and more continuous accommodations for bicyclists and pedestrians" (within the project corridor);

WHEREAS, the first stated goal of the TxDOT I-35 Capital Express Central Project is to “enhance safety,” however, significantly more energy and materials within the Virtual Public Meeting from 11/12/20 is spent describing current travel time issues than current safety issues, despite safety issues resulting in a profound loss of life;

WHEREAS, National Association of City Transportation Officials (NACTO) guidelines for all ages & abilities bicycle facilities state bicycles should be separated from pedestrians where significant volume of either mode is present and American Association of State Highway Transportation Officials (AASHTO) guidelines state "segregation of pedestrians from wheeled [e.g. bicyclists] users may be appropriate";

WHEREAS, there will be high enough pedestrian volume throughout the project corridor to warrant that the walkway and bikeway are separate from each other;

WHEREAS, the Red Line Trail and Parkway are projected to have over 10,000 daily users at both crossings of I-35 upon completion circa 2030;

WHEREAS, TxDOT recognizes the "local and regional importance of the proposed I-35 Capital Express Central Project," and espouses to "encourage the participation of all interested stakeholders," but the originally proposed 30 day deadline for public comments on the Draft coordination plan and schedule, Draft project purpose and need, and the Draft range of alternatives is unduly inadequate for many interested stakeholder groups which convene only once per month;

WHEREAS, the City, County, TXDOT, and the Capital Area Metropolitan Planning Organization have an obligation to consider past inequities and potential disproportionate impacts of project alternatives and mitigate negative impacts through equitable planning processes and outcomes;

NOW THEREFORE, BE IT RESOLVED, the PAC and the BAC recommend that safety for all road users be prioritized above all other considerations during the design and implementation of the I-35 Capital Express Central Project, and that language reflecting this be added explicitly to the Purpose and Need clearly indicated as a higher priority than congestion;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT prioritize safe, all ages and abilities east-west connectivity across and along the I-35 corridor;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend the implementation of protected all ages & abilities high comfort bikeways which are separated from both motor vehicle lanes and pedestrian sidewalks along the entire project corridor;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend project elements (aside from the controlled access facilities) should be designed and operated as multimodal city streets using target speeds, design speeds, and posted speeds of 30 mph or less in accordance with NACTO and City of Austin design guidelines, including sufficient safety lighting for all users;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend all controlled access facilities should be designed with modern design guidance, including the most recent AASHTO Green Book, using target speeds, design speeds, and posted speeds appropriate for a dense urban context and to allow seamless and safe integration with a safe, multimodal urban street grid;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend TxDOT commit to a full and honest consideration of alternatives to the current proposed design, up to and including fully burying the highway through downtown or dismantling and re-designating I-35 along another existing highway, e.g. US 183 or SH 130, to enable the City of Austin to reconnect its street grid and repair the divide that presently separates it;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend TxDOT consider alternatives proposed by Our Future 35, Reconnect Austin, and Rethink35 in furtherance of this goal;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend minimal implementation of slip lanes and that any slip lanes in this corridor should be designed with tight tolerances and clear sight lines to crossing walkways and bikeways that slow right turns to improve safety for people crossing those slip lanes, and that crossings be raised;

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BE IT FURTHER RESOLVED, the PAC and the BAC recommend that the Airport Blvd. intersection configuration take into consideration a future Hancock transit station for the Gold Line and/or the Red Line by creating a superior pedestrian and bicycling crossing, including putting the intersection of Airport Blvd. and I-35 frontage road (street lanes) underground and providing plaza, park, and buildings opportunities on the surface;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT and the City of Austin mutually pursue an interlocal agreement for implementation of surface-level improvements that are not within the direct purview of TxDOT, e.g. caps and real estate value capture;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT consider utilizing pedestrian scramble phases at intersections with high pedestrian volumes;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend TxDOT allow 90 days of public input after the publication of technical reports and other relevant project documentation for all public comment periods for the remainder of the environmental process;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT provide $500 million for pedestrian and bicycling improvements to local streets and trails within 3-5 miles of the project in order to mitigate the negative consequences of additional motor vehicle traffic on local streets caused by any additional motor vehicle capacity of the proposed project;

BE IT FURTHER RESOLVED, the PAC and the BAC request that Austin City Council actively engage in every phase of the TXDOT environmental process for I-35 central and incorporate these recommendations and those of other community groups into their own comments as appropriate;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT provide $650 million for facilitating construction of affordable housing and support programs for people experiencing homelessness on I-35 and Austinites displaced, or in danger of being displaced along the corridor;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT adds to the Project Purpose and Need to align with local plans and goals, including, but not limited to, the Austin Strategic Mobility Plan, Street Design Guide, City of Austin Vision Zero goals, Imagine Austin Comprehensive Plan, and the Austin Climate Equity plan;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT design bike-ped crossings to be safe for vulnerable road users, especially in areas where a drivers' attention is primarily focused on merging with traffic;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT create effective wayfinding systems to provide well-structured directions for people walking and biking. These would have distances to key destinations, as well as estimated time to bike or walk to those destinations;

BE IT FURTHER RESOLVED, the PAC and the BAC recommend that TxDOT provide bicycle and pedestrian infrastructure like street furniture, water fountains, and tree plantings to increase economic activity, improve environmental quality, and provide shade. Trees should be between fast-moving cars and people to add safety and comfort for vulnerable road users.

Date of Approval: December 15, 2020

Vote: 9-0.

Attest:

Laura Dierenfield, Staff Liaison

From: Taylor, Karla [redacted]
Sent: Wednesday, December 30, 2020 10:38 AM
To: Tucker Ferguson <Tucker.Ferguson@txdot.gov>; Susan Fraser <Susan.Fraser@txdot.gov>
Cc: Fiandaca, Gina [redacted]; Spillar, Rob [redacted]; Krause, Cheyenne [redacted]>; Taylor, Karla [redacted]
Subject: City of Austin comments on the I-35 Capital Express Central Project Scoping, Statement of Purpose and Need, and Proposed Alternatives

Dear Mr. Tucker and Ms. Fraser,

On behalf of the Assistant City Manager Gina Fiandaca, please see the City of Austin's response and detailed comments on the I-35 Capital Express Central Project CSJ# 0015-13-388 Scoping Statement of Purpose and Need, and Proposed Alternatives. We are also attaching resolutions from our citizen commissions, the Urban Transportation Commission, Pedestrian Advisory Council and the Bicycle Advisory Council.

It is our strong desire to work with the Texas Department of Transportation to make this I-35 rebuild a success for our local, regional and state travelers and our community.
We are also submitting these comments via certified mail and electronically to the project site email.

We look forward to working with you on this monumental project. Thank you.

Gina Fiandaca
Assistant City Manager (Mobility)
City of Austin

Karla Taylor
Chief of Staff
Austin Transportation Dept.

Ms. Bruck-Hoyt

Find attached the NEPA review by TCEQ for project I-35 CAPITAL EXPRESS CENTRAL PROJECT CSJ:0015-13-388

Please feel free to contact me if you require further information.

Jeff Benavente
NEPA Coordinator
Texas Commission on Environmental Quality
Austin, TX 78711
[redacted]

Re: Response to Request for TCEQ Environmental Review

The Texas Commission on Environmental Quality (TCEQ) received a request from the Texas Department of Transportation (TxDOT) regarding the following project:

I-35 CAPITAL EXPRESS CENTRAL PROJECT CSJ:0015-13-388

This project is in an area of Texas designated by the United States Environmental Protection Agency as unclassifiable or in attainment of the National Ambient Air Quality Standards for all six criteria air pollutants. Air Quality staff has reviewed the document in accordance with transportation and general conformity regulations codified in 40 Code of Federal Regulations Part 93. We concur with TxDOT's assessment.

TxDOT will still need to follow all other applicable laws related to this project, including applying for applicable permits.

If you have any questions, please feel free to contact the NEPA Coordinator at [redacted].

From: [redacted]
To: [redacted]
Date: Friday, December 11, 2020 11:38:51 AM
Attachments: TXDOT I35 EIS UT Austin.pdf

This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Tricia,

Thank you for the opportunity on behalf of the University of Texas at Austin to submit comments related to formulating the environmental impact statement related to central corridor project for I35.

The attached document is representative of issues important to the project and our interests. Please fell free to contact me if additional information or clarification is required.

Sincerely,

James H. Johnson, Assistant Vice President for Campus Safety
The University of Texas at Austin | Campus Safety | [redacted]
https://financials.utexas.edu/avp-campus-safety

Office of Campus Safety

304 East 24th Street, Suite 202 •C2699 • Austin, TX 78712 • 512-471-5767
jimmy.johnson@austin.utexas.edu

Tricia Bruck-Hoyt, AICP, PMP | Mobility35 GEC Environmental Lead
Austin District, TX DOT
7901 N. IH 35, Austin, TX 78753

Tricia,

Thank you for the opportunity to engage on behalf of the University of Texas at Austin, as a Cooperating or Participating Agency in the development of an Environmental Impact Statement (EIS) for the I-35 Capital Express Central project in Travis County. The proposed improvements include adding two, non-tolled managed lanes in each direction along I-35 from US 290 East to SH 71/Ben White Boulevard, with additional flyovers at I-35 and US 290 East. The proposed project also includes reconstructed ramps, bridges and intersections; improved frontage roads; enhanced bicycle and pedestrian paths; and transit accommodations. This corridor and such improvements, while meaningful for the community at large, create considerations that could have a harmful effect to the environment as well as the interests of the university.

As part of the formal coordination process, required by the Council on Environmental Quality, which determines the scope of issues to be addressed and identifies significant issues related to the proposed project, I would like to include these items as part of the record for future discussion. The university welcomes constructive dialogue in reaching a consensus on issues important to both the university and the community.

1. Existing university operations fueling location located at the intersection of I35 NB service road and Manor.
2. The existing Material Transfer Center supporting research laboratories and the academic mission located at I35 SB – Clyde Littlefield intersection.
3. Existing cemetery at I35 NB service road.
4. Athletic practice facilities located in proposed ROW, I35SB service road and Dean Keeton
5. Property bordered by Clyde Littlefield, Red River, MLK and I35 SB service road. Of note, no known excavation has been executed on this area. Historical records of use are unremarkable.
6. All storm water runoff generated from any areas impacted by the I35 corridor project require management in accordance with TXDOT's MS4 permit with TCEQ. Any impacts on the university's MS4 permit must be coordinated with the University of Texas at Austin office of Environmental Health & Safety.

Sincerely, on behalf of the University of Texas at Austin,

James H. Johnson
Assistant Vice President for Campus Safety

From: Suzanne Walsh
To: Tricia Bruck-Hoyt-C
Subject: RE: TXDOT EIS Participating Agency - I-35 from US 290 E to US 290W/SH71
Date: Tuesday, December 22, 2020 4:56:04 PM

Tricia,

This email is in response to your request for agency information, issues, or concerns about the proposed I-35 Capital Express Central Project from US 290 East to US 290 West/SH 71 in Travis County (CSJ: 0015-13-388). Below is a list of topics that TPWD believes that TxDOT should consider when choosing an alternative route and should study in detail in the EIS. Please note that this list is based on the very limited amount of preliminary information TPWD has about the project and does not represent all TPWD comments and recommendations on the project. Please continue to include me in notifications about upcoming scoping meetings. TPWD would like to review and comment on the draft EIS when it is available.

TPWD recommends referring to the Texas Conservation Action Plans (TCAP), TPWD Rare, Threatened, and Endangered Species of Texas (RTEST) by County application, and the Texas Natural Diversity Database (TXNDD), and Ecological Mapping System of Texas (EMST) for information regarding sensitive resources potentially occurring in the area, priority habitats, and issues affecting sensitive resources within Travis County and avoid adverse impacts to the these resources by route selection and or adjustments.

TPWD has concerns about the potential to encounter sensitive karst features and caves from the tunneling portions of the highway associated with the alternatives. Some of these features may be detectable from the surface while others may be discovered only during excavation activities. TPWD recommends having a qualified biologist perform a karst feature survey of the project limits in order to better understand the potential for impacts to karst features in the project area.

TPWD has concerns about temporary and permanent impacts to Colorado River from the reconstruction of the bridge over Lady Bird Lake. All waterways and associated floodplains, and riparian corridors, regardless of their jurisdictional status provide valuable habitat and should be protected to the maximum extent possible. TPWD recommends that TxDOT should avoid impacts to all aquatic habitats within the project area. Further, TPWD recommends that impact avoidance measures for aquatic organisms, including all native fish and freshwater mussel species, regardless of listing status, be considered during project planning and construction activities.

Based on our understanding of the project limits, this effort will more than likely involve the taking of federally protected public parkland as identified in the Land and Water Conservation Fund (LWCF) grant 48-00450- Austin Town Lake IV. If ROW expansion is needed along the Town Lake bridge areas, the City of Austin will be responsible for acquiring new parkland of at least equal fair market value to, and recreational usefulness of, the area removed from the park boundary. Additional information can be found in TPWD Local Park Grant Program's Conversion Guidelines.

TPWD appreciates the opportunity to provide comments on the proposed I-35 Capital Express Central EIS in Travis County.

Sincerely,

Suzanne Walsh
Transportation Conservation Coordinator
TPWD – Wildlife Habitat Assessment Program
Phone: (512) 389-4579
Suzanne.Walsh@tpwd.texas.gov

From: Tricia Bruck-Hoyt-C <TBRUCK-C@txdot.gov>
Sent: Thursday, October 1, 2020 2:55 PM
To: Suzanne Walsh <Suzanne.Walsh@tpwd.texas.gov>
Cc: Heather Ashley-Nguyen <Heather.AshleyNguyen@txdot.gov>; Susan Fraser <Susan.Fraser@txdot.gov>; Adam Kaliszewski <Adam.Kaliszewski@txdot.gov>; Shirley Nichols <Shirley.Nichols@txdot.gov>; Lindsey Kimmitt <Lindsey.Kimmitt@txdot.gov>; Sonya Hernandez <Sonya.Hernandez@txdot.gov>; Shelly Eason <Shelly.Eason@txdot.gov>
Subject: RE: TXDOT EIS Participating Agency - I-35 from US 290 E to US 290W/SH71

Suzanne,

Thank you for your response and we look forward to working with the Texas Parks and Wildlife Department on this project.

Thanks,

Texas Department of Transportation
Tricia Bruck-Hoyt, AICP, PMP | Mobility35 GEC Environmental Lead
Austin District
7901 N. IH 35, Austin, TX 78753
Phone: (512) 832-7256 office (512) 739-9450 cell | Email: tbruck-c@txdot.gov

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From: Suzanne Walsh [mailto:Suzanne.Walsh@tpwd.texas.gov]
Sent: Thursday, October 01, 2020 11:17 AM
To: Tricia Bruck-Hoyt-C <TBRUCK-C@txdot.gov>
Subject: TXDOT EIS Participating Agency - 1-35 from US 290 E to US 290W/SH71

Ag eeting #1

Thank you for your letter of September 14, 2020 inviting the Texas Parks and Wildlife Department (TPWD) to become a Participating Agency for the preparation of an Environmental Impact Statement for I-35 from US 290 E to US 290 W/SH 71 in Travis County (CSJ:0015-13-388). TPWD appreciates the opportunity to participate in the environmental review process, and this email acknowledges that TPWD will act as a participating agency for this project. If you have any questions, please contact me at (512) 389-4579.

Sincerely,

Suzanne Walsh
Transportation Conservation Coordinator
Wildlife Division – Wildlife Habitat Assessment Program
Texas Parks and Wildlife Department
4200 Smith School Road
Austin, TX 78744
Phone: (512) 389-4579
Suzanne.Walsh@tpwd.texas.gov