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TxDOT Leadership,

Reconnect Austin appreciates the opportunity to comment on the draft Environmental Impact Statement for I-35 Cap Ex Central. While this project has been improved over time, there are still concerns from our organization, and from the community, which remain unaddressed. Many of these concerns have been presented to TxDOT previously, yet have not been appropriately addressed, in part due to the misleading reframing of “comment themes.” As the project of I-35

expansion moves closer to reality, Reconnect Austin strongly maintains that community feedback must be effectively addressed and that the concerns of those most impacted by highway expansion, local Austinites, must be heard.

This is a massive project that will impact Austinites for generations. We have one opportunity to get it right. Austinites will be living with this project for the next 70 years. Any build project for I-35 will consume massive resources in time, money, and construction materials. Any build project of this size and cost should benefit our children and grandchildren. This project is still a massive boondoggle that could and should provide better connectivity, better mitigate air, water, and noise pollution, better mitigate induced demand, provide opportunities for local economic development, repair the harms this highway has foisted on its neighbors, and be designed to ensure that people using this corridor are not subjected to serious injuries and death. Without a clear demonstration that this project is projected to provide the most benefit of all potential alternatives, not just convenient alternatives, it is fundamentally irresponsible to begin construction. Moreover those projections must represent the most sophisticated and contemporary methods of understanding multi-modal transportation, rather than outdated assumptions of automobile priority.

The coverage of highway-related pollution in the DEIS is an exemplary demonstration of precisely what improvements must be made to reach a modern understanding of the impact of vehicles & highways. The analysis in the DEIS is missing critical information. The DEIS must include a robust analysis of Particulate Matter (including PM 2.5 and PM 10), NOx, Volatile Organic Compounds (VOCs), and greenhouse gasses (GHGs) over the life of the project and not just construction. Any analysis should study the current rates of asthma and health concerns in children, elderly, and other vulnerable populations.

Please do not proceed with this project without a rigorous study of all pollutants that cause harm to humans and a rigorous health impact analysis to understand both current and future impacts.

If TxDOT will not mitigate these harms, then TxDOT should at the very least do a rigorous analysis of these harms and the opportunities we forgo with the current preferred alternative. The air pollution appendix and greenhouse gas emissions / climate change appendix are missing critical analyses. This project should not proceed until those egregious omissions are corrected.

Because of strong community feedback, and detailed technical feedback from the City of Austin, this project finally has a Purpose and Need that addresses safety. Even so, the DEIS has no rigorous study of traffic fatalities and serious injuries in this corridor, no DEIS appendix addressing safety, and no evaluation of how this project will ensure TxDOT meets its own Road to Zero goals to cut traffic deaths in half by 2035 and end traffic deaths by 2050. Without a demonstration of the prioritization of safety along the I-35 corridor the planned highway expansion cannot be said to fulfill its own Purpose and Need statement.

Reconnect Austin has commented extensively at every opportunity. Our previous letters,

dated 12/31/2020, 4/9/2021, and 9/24/2021, are hereby attached to this letter and re-submitted in their entirety as comments for the I-35 Capital Express Draft Environmental Impact Statement (DEIS) record. These letters contain many concerns we previously raised with this important project; these comments are germane to the DEIS. We respectfully request that these letters (this one and the three previously submitted) be added to the TxDOT library for the I-35 Cap Ex Central DEIS, to be reviewed, considered, and addressed.

The Austin community has done an amazing job giving TxDOT feedback on this project. Over 9,500 comments, many of them lengthy detailed letters, were submitted during Scoping. While the Purpose and Need, project schematic designs, alternatives evaluation matrix, and environmental review were all improved based on that strong community feedback, the project still warrants additional improvement. Please address community concerns and resolve issues, then issue a revised draft EIS for review and public comment, all prior to the issuance of the final EIS.

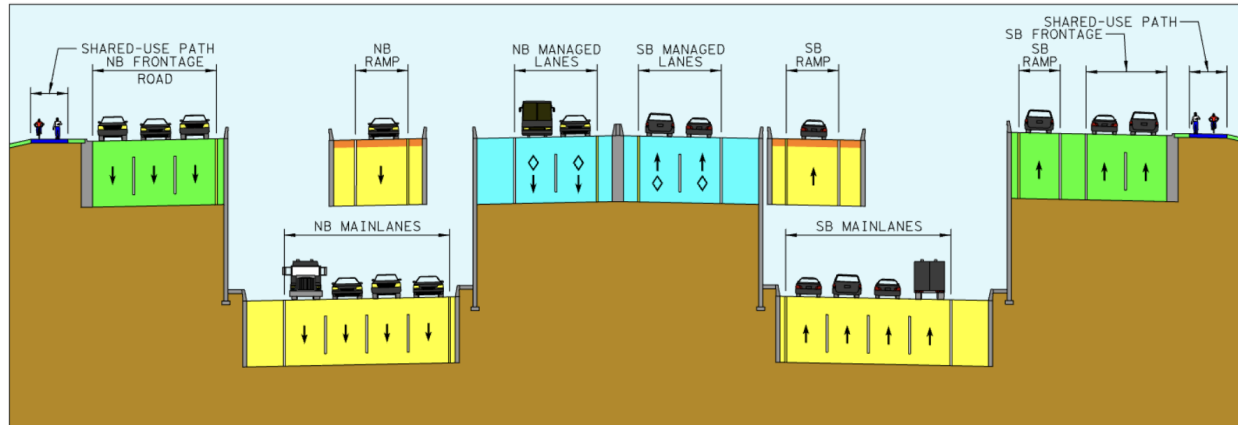
In order to ensure resolution and the creation of the best project possible, Reconnect Austin requests that TxDOT issue a second draft of the EIS to correct significant deficiencies in the current draft EIS.

Reconnect Austin also requests that any Final Environmental Impact Statement (FEIS) have a 90-day review period, with an official public comment period, and that the FEIS be unbundled from the Record of Decision.

Overarching Concerns

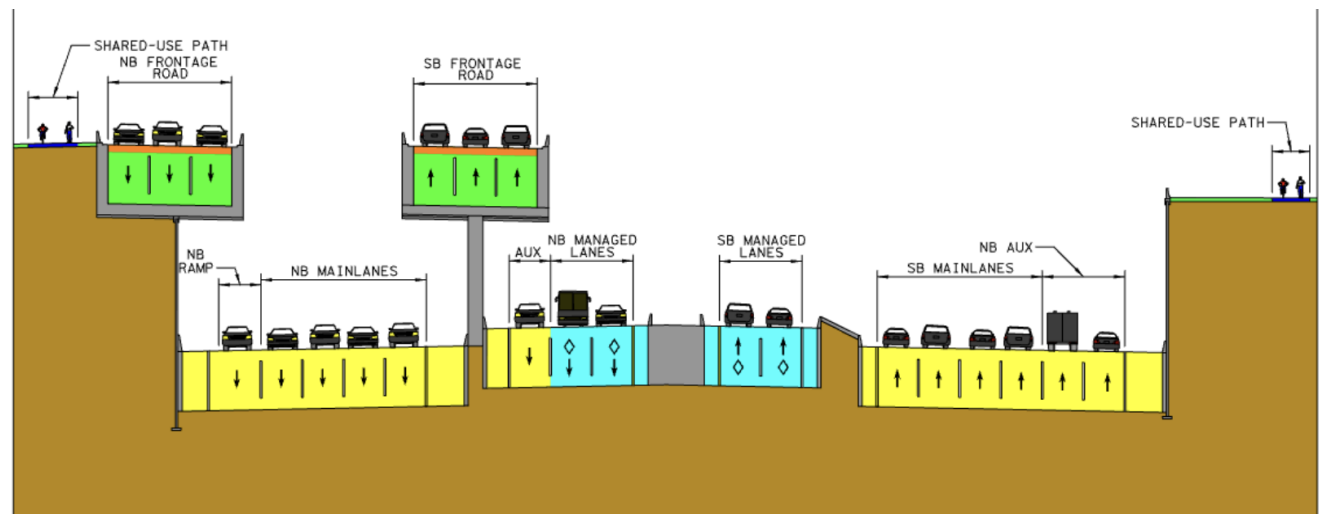
Massive highways are incompatible with thriving urban areas. They are out of scale with the surrounding environment and create a significant barrier to access. People who live in cities have goods, services, education, and medical care in close proximity and need access to those services. A 20 lane highway is a significant barrier and is inappropriate in this environment.

Please stop telling the public that this project adds 4 lanes to I-35. This project's ultimate footprint is 20 lanes. Telling the public otherwise is disingenuous and creates distrust.



SECTION C-C

Lanes- 20



SECTION G-G

Lanes- 22

In the heart of Austin, TxDOT should downgrade I-35 so that it fits better in the urban context, with continuous sidewalks, protected bike lanes, and no more than 8 lanes for vehicles. If TxDOT builds an urban arterial instead of a highway, the people near I-35 will enjoy better air quality, less flooding, more economic development, and greater safety.

The I-35 corridor serves as a significant barrier that should have many more crossing points than it does today. Crossing points should occur every $\frac{1}{4}$ of a mile and never be more than $\frac{1}{2}$ mile apart. While we appreciate that bridges are now required to have a 20 foot buffer between moving vehicles and people walking / biking, there need to be more of them. All crossings should be at grade.

I-35 should be no higher and no wider, as promised by state leaders. Bulldozing existing homes and businesses damages the local economy, pushes residents further out, and removes community-serving businesses from the people living nearby. Narrowing the footprint of the highway, as has been requested by thousands of Austinities, has many benefits, including

preserving existing housing and businesses, and moving pollution concentrations further away from humans living / working nearby.

The preferred alternative, Modified Build Alternative 3, was released to the public without an official comment period or an official record of public feedback. This strategy ensured there was no official opportunity to provide written feedback, on the record, prior to this alternative being selected as the preferred alternative.

TxDOT should always prioritize safety over speed. 25% of all traffic fatalities within the entire 325 square mile City of Austin occur in this corridor. A wide, high-speed highway is incompatible with TxDOT's commitment to end traffic deaths. This project should not move forward until it can demonstrate that it will meet City of Austin Vision Zero goals and TxDOT's adopted Road to Zero goals.

The community deserves the time necessary to provide quality feedback on this project. Local organizations, representing thousands of Austinites, have repeatedly asked for a minimum of 90 days to review and comment on this complicated project. This DEIS comment period has been the longest at 60 days, but only because NEPA rules mandated 60 days. The DEIS is over 8,000 pages of technical documents and 60 days has been insufficient.

We again request that all public comment periods be a minimum of 90 days. We request that the release of the Final Environmental Impact Statement include a minimum 90 day official public comment period, where all community feedback is included in the public record, and that the Record of Decision not be published until after that public comment period ends and TxDOT staff has had time to read through all public comments received.

This project will never meet the stated goal of "solving congestion." Even TxDOT staff admit that we cannot build our way out of congestion and that Transportation Demand Management (TDM) is far more effective at reaching this goal. The 2013 scenario planning for this project, Mobility Investment Priorities Project: Long-Term Central Texas IH 35 Improvement, commissioned by TxDOT and conducted by the Texas Transportation Institute (TTI), clearly demonstrated that the most effective build scenario reduced future congestion by 5% while TDM reduced future congestion by 40%.

We all learned during COVID lock downs that changing demand on the system showed powerful results. Telecommuting is now widespread and cities are expected to have already reached their expected commuting patterns. Yet traffic modeling was done before COVID changed travel demand and assumes we will continue to replicate 20th century commute patterns. We should be paying attention to the lessons of COVID and focusing more seriously on TDM.

While this project does include Shared Use Paths (SUPs) and non-tolled managed lanes, which buses will be allowed to use, those are still minor steps toward a robust TDM strategy. This project will increase vehicle miles traveled (VMT) in far greater numbers than any HOV or SUP

can mitigate. A robust TDM study would help the entire region prioritize moving people efficiently.

This project will result in over 42 lane-miles of expansion in the Central portion alone. Resulting in an additional 320 M additional Vehicle Miles Traveled (VMT), will burn the equivalent of 17 million more gallons of gasoline every year, and generate 150,000 tons of CO₂. And that is just the 8 mile I-35 Cap Ex Central project.

The full project was segmented into three parts. The lane mile expansion for Cap Ex North and Cap Ex South is many times greater and over 60 miles in length. How is it acceptable that those projects were issued Findings of No Significant Impact (FONSI)s? Transportation accounts for 36% of greenhouse gas (GHG) emissions in Austin. In combination Cap Ex North, Central, and South will ensure we are never able to meet our climate equity goals.

TxDOT should do current scenario planning for the I-35 corridor and consider urban infill scenarios. The status quo of suburban sprawl brings traffic death, pollution, and flooding. Sprawl makes us car-dependent, which harms physical fitness and increases cost-of-living. This project is literally doubling down on the sins of the past.

As stated above, the environmental analysis for this DEIS is lacking in rigor. The DEIS should be updated to address serious environmental review concerns and reissued, with an official public comment period, before proceeding.

Air pollution is a documented public health emergency, and can affect every organ in the body, including cognition. Children and the elderly are disproportionately vulnerable to air pollution, specifically PM_{2.5}, and more so if they live in close proximity to a highway. Air pollution can cause a multitude of diseases in adults, including heart disease, and can breach the placental barrier during pregnancy, causing miscarriages and birth defects. These impacts are well documented and have been noted in academic studies for over a decade. TxDOT should not proceed with this project until they have conducted a full study of existing and future air pollution on this highway, both at the regional scale and immediately adjacent to the highway.

DEIS Appendix P (Air Quality) contains only a study of carbon monoxide (CO) and does not include any study of particulate matter, despite a wealth of academic research on the dangers of particulate matter to human health both directly adjacent to highways and on a regional scale, and a commitment by the Environmental Protection Agency (EPA) to lower attainment standards for PM_{2.5}, which could put Austin in nonattainment status once implemented. We request that TxDOT study air quality along this corridor for PM_{2.5}, PM₁₀, and NO_x as well as CO. PM_{2.5}, PM₁₀, and NO_x are all criteria pollutants and pose great danger to human health, especially for people living and working close to the highway. We request that TxDOT specifically study black carbon, a type of PM_{2.5}, and address both current levels and expected increases from the proposed expansion. TxDOT should not move forward with the Final EIS and ROD until a full analysis of PM_{2.5} including black carbon, PM₁₀, and NO_x, as well as other tailpipe pollutants including carcinogens, along the highway and across the region has been conducted, taking into account updated attainment standards from the EPA.

The Mobile Source Air Toxins analysis in the DEIS is lacking, and includes only a qualitative analysis. The DEIS claims that MSAT will decrease with time because of improved federal standards. We argue that this is an outsourcing of responsibility to mitigate air pollution in the I-35 corridor, and request that TxDOT complete a quantitative MSAT analysis and a health impact assessment for all criteria pollutants.

DEIS Appendix V (Greenhouse Gases) is incomplete. While we appreciate the inclusion of the project-level GHG analysis, we are disappointed that the analysis only discusses impacts of construction and in the short term. We request that TxDOT complete an updated GHG analysis which compares No Build to the long-term completed project at 10 years post construction, 20 years post construction, etc., through the expected lifetime of this facility.

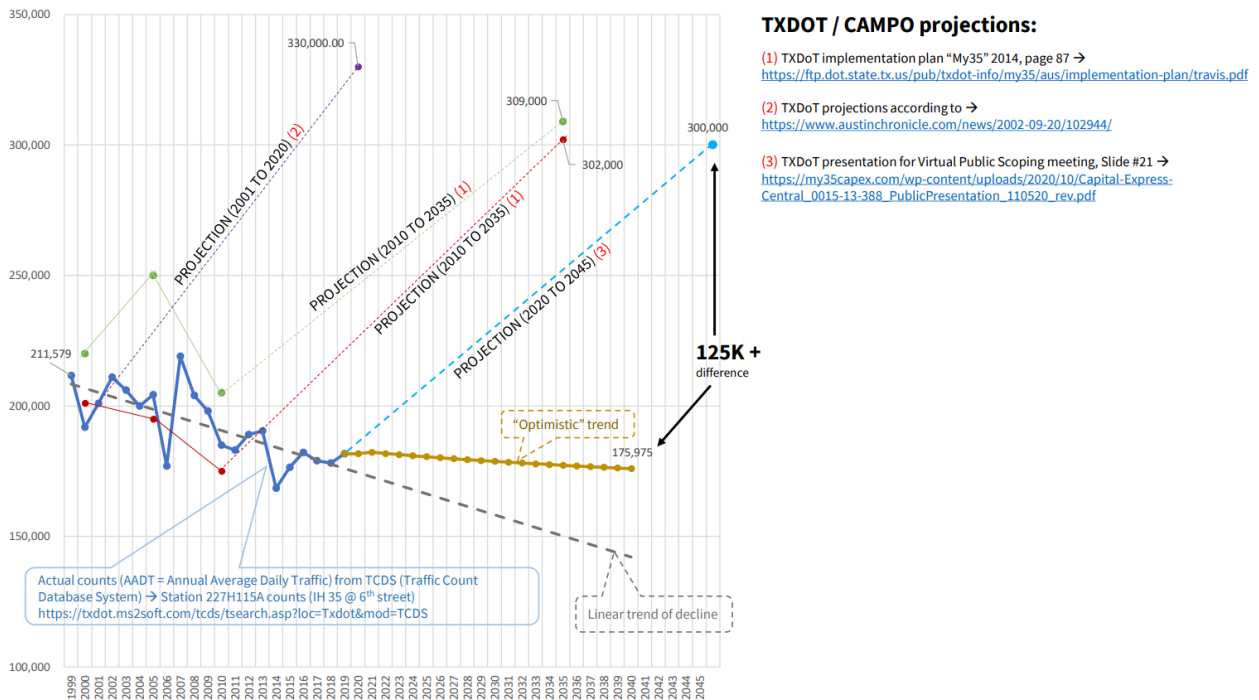
The DEIS fails to address air pollution from traffic beyond tailpipe emissions. A growing body of academic research cites brake wear and tire friction as primary pollutants from traffic. The DEIS has not addressed either of these sources of pollutants, nor does it address benzene or Volatile Organic Compounds (VOCs). We request that TxDOT complete detailed analyses of each of these pollutants, and compare pollutant levels on I-35 today (for each pollutant) to expected levels during and after construction of Mod Alt 3.

The DEIS notes in several places that expected proliferation of electric vehicles (EVs) should improve air pollution in this corridor. This is not only abdicating responsibility for mitigating air pollution, but a misrepresentation of electric vehicles and their environmental benefits. While EVs do reduce tailpipe emissions from internal combustion engines (ICEs), they do nothing to reduce pollution from non-tailpipe sources including brake dust and tire friction. Pollution from tire friction may worsen in EVs due to increases in vehicle weight from electric batteries. Further, Texas' electric grid is far from clean, and EVs that source their energy from unclean sources are, therefore, unclean themselves.

Ozone is a significant issue in Austin and NO_x, precursors to ozone, are not addressed. An expansion of I-35 will push pollutants nearer to the places people live and work. Pollutants from highways are most concentrated at the highway, so pushing the highway closer to where people live, work, and recreate puts them in harm's way. Many people living and working near this major highway are disadvantaged and part of environmental justice communities.

The modeling of the air quality analysis, coupled with the absence of actual air quality monitors along this corridor is highly concerning. We request that TxDOT conduct a complete air quality analysis addressing all of the above concerns (tailpipe emissions beyond CO; PM_{2.5}, PM₁₀, NO_x; brake dust and tire friction; unclean energy grid; ozone; VOCs and benzene), starting with placing air quality monitors along the highway to collect real-time data. The DEIS does not include any raw air quality data for I-35 today, nor any understanding of how existing pollution is impacting people living and working near the highway right now. Modeling air quality and pollutants is not acceptable; TxDOT's analysis must first collect real data from the highway today before analyzing it against modeled data for Mod Alt 3.

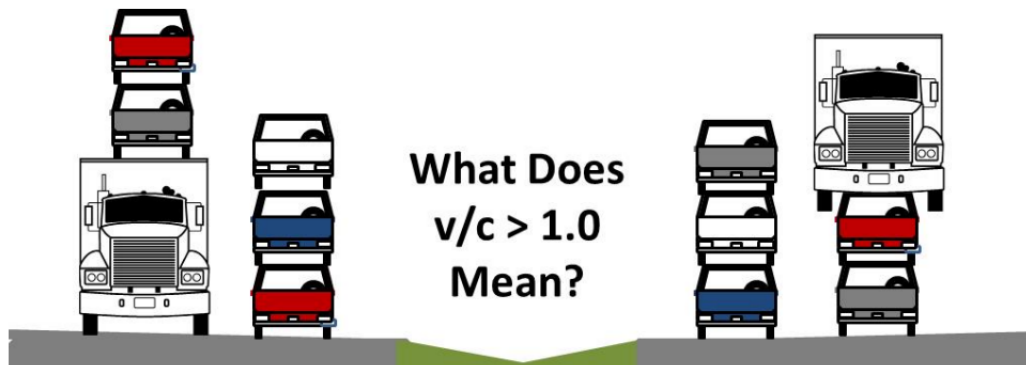
TxDOT's use of modeled air quality for all pertinent analyses is especially worrisome when TxDOT intentionally used traffic counts for the basis of the modeling that are unattainable on I-35 as it exists today. I-35 carries 200,000 AADT, and has for the last 20 years (see chart), yet TxDOT assumed 330,000 AADT (which will not physically fit in this right of way) to model existing air pollution. Using inflated numbers for the existing condition makes it falsely appear that future air pollution will be similar to today's levels.



The graphic below, taken from the [Mobility Investment Priorities Project: Long-Term Central Texas IH35 Improvement Scenarios](#) (pg. 23), which TxDOT commissioned in 2013, shows what 330,000 vehicles (volume to capacity ratio exceeding 1, v/c > 1) looks like:

Exhibit 3 Capacity Concept in Traditional Regional Model Assignment

Traffic is allowed to stack
(v/c = traffic volume-to-capacity)



Clean Air

- There are only 2 air quality monitors that monitor PM 2.5 in the Austin region, neither of which are anywhere near I-35.
- TxDOT has no air quality monitors along I-35.
- Appendix P, Air Quality, uses modeled air quality data based on assumed levels of traffic. Please redo this analysis with actual air monitor readings and actual traffic counts.
- Appendix P, Air Quality, only analyzes carbon monoxide (CO). It should also analyze Particulate Matter 2.5 (PM2.5), Particulate Matter 10 (PM10), and Nitrous Oxides (NOx). These pollutants are much more dangerous to human health than CO and should not have been ignored.
- The Air Quality work should also analyze Volatile Organic Compounds (VOCs). VOCs and NOx are precursors of Ozone. Austin has a history of violating Ozone standards.
- Studies of the I-35 corridor show over 80 schools and daycares in close proximity. They also show populations of low income communities. These environmental justice populations are being exposed to high levels of concentrated pollutants.
- There is no existing study of how human health is impacted by I-35.
- Children are more susceptible to air pollution because they breathe more rapidly and their organs are still developing. There is no study of the health of children living along the I-35 corridor, or recognition on the part of TxDOT that pollutant levels which are deemed acceptable for adults are above acceptable levels for children and contribute to many long-term health issues.
- Diesel engines contribute more particulate matter than passenger vehicles, including black carbon. Diesel 18 wheel trucks emit 50 times more particulate matter than a car.
- PM2.5 is so harmful that The Environmental Protection Agency is in the process of public comment to lower PM2.5 emissions limits. The Austin region currently has $9.6 \mu\text{g}/\text{m}^3$, and the EPA is expected to lower PM2.5 attainment standards to $9 \mu\text{g}/\text{m}^3$. This

project should not be pushed through without a meaningful and robust analysis of PM2.5, especially black carbon. Austinites are breathing PM2.5 today as a result of I-35 and adding capacity will only worsen resulting public health impacts.

- Plant thousands of trees in the I-35 corridor to reduce the heat island effect and pollution impacts of the highway.
- Reconnect Austin has submitted articles, studies, and reports regarding air pollution next to highways, including but not limited to research on: induced demand, tailpipe vs. non tailpipe emissions, EVs and AVs, air pollution impacts to human health, impacts of climate change, PM2.5, PM10, NOx, VOCs, benzene, and more. All links, attachments, etc. must be considered part of Reconnect Austin's comment on the DEIS. These are part of the public record and must be addressed accordingly.

Climate Change

- This is the first time TxDOT has ever included a climate change analysis in a DEIS. We appreciate this inclusion, but note that the DEIS states this climate change analysis was only included because of strong community feedback asking for it.
- Transportation is the single largest source of greenhouse gasses (GHG) in Austin.
- The City of Austin has a robust Climate Equity Plan that is currently being ignored by TxDOT.
- The I-35 project will likely mean that the City of Austin will never be able to meet its stated mode shift and climate equity goals.
- The RMI SHIFT (State Highway Frequency of Induced Travel) Calculator shows that the number of highway lane miles added with this project, 45 lane miles per TxDOT, will significantly contribute to an unfolding global climate crisis by generating 273 to 409 million vehicle miles traveled (VMT) annually, generating millions of metric tons of carbon dioxide.
- The original Project Alternatives Evaluation Criteria did not include climate change, even when transportation is the largest sector of greenhouse gas emissions (36%), and was only added because of the outcry from the local community.
- Heat island impacts are known to be caused by highways for a variety of reasons. TxDOT should be studying existing and future heat island impacts, especially as this highway will be wider than the existing.
- Plant thousands of trees in the I-35 corridor to reduce the heat island effect and pollution impacts of the highway.
- The analysis in Appendix V only looks at greenhouse gas emissions (GHGs) and climate change impacts during construction only. Given that TxDOT includes projections of traffic and vehicular use of the highway for its lifespan, this is a major oversight, and the project should not proceed until the analysis studies the long term impacts of increased highway capacity and traffic expansion 20 years out, 30 years out, 40 years out, and 50 years out, at a minimum.
- Reconnect Austin has submitted articles, studies, and reports regarding climate change and greenhouse gas emissions. All links, attachments, etc. need to be considered part of Reconnect Austin's comment on the DEIS. These are part of the public record and addressed accordingly.

Clean Water and Parkland

- Runoff and stormwater from I-35 should be both filtered and treated before it is emptied into the Colorado River.
- Redesign water management, including management of stormwater, runoff, and flooding, to ensure that water is filtered and treated before discharging into the Colorado River.
- TxDOT has a duty to comply with the City of Austin Watershed Protection ordinances.
- TxDOT should comply with all water quality regulations that ensure the health of communities downstream of this project, including rice farmers and downstream cities like Bastrop.
- Water outflow pipes across from Roy G. Guerrero Metropolitan Park could cause future damage to the park.
- There will be significant direct and cumulative impacts to parkland and natural areas, including, but not limited to, the Butler hike and bike trail, Palm Park, Waterloo Greenway, Lady Bird Lake, Town Lake Metropolitan Park, Waller Beach, Edward Rendon Sr. Park, Festival Beach, and Roy G. Guerrero Metropolitan Park. The current project does not do enough to protect those natural resources.
- Provide additional protections for Austin's parkland and open spaces, including adding parkland and open space amenities that benefit the citizens of Austin. Ensure that any parks, which are directly impacted (as listed above) and any urban trails directly impacted, including the Butler Hike-and-Bike Trail, the Eastlink Trail, Waller Creek Trail, and the Red Line Parkway, have improved access and usability with this project.
- All links, attachments, etc. need to be considered part of Reconnect Austin's comment on the DEIS. These are part of the public record and addressed accordingly.

Noise

- The projected noise impact of the highway assumes that the traffic on the highway will be traveling at the posted speed limit of 70 MPH, when evidence from other similar highways in the region suggests that when congestion does not limit speed traffic will be going faster. Because of this oversight, receivers that are shown as not impacted by the highway expansion projections probably will be impacted by the conditions of the real-life highway, and TxDOT should do an expanded study that takes into account inconsistent traffic patterns.
- Furthermore the current measurement of projected sound levels is based on an equalized 24 hour average, and the exclusion of any projection of peak sound levels means that TxDOT simply doesn't know (or hasn't shown) the real impact of highway-generated sound, not just as a constant level of noise but also as a peak. This should be included in an expanded sound study.
- The receivers used to measure sound impact are all considered 'areas of frequent human activity' but considerations are only made for the primary use of a piece of land. There are receivers in parks, but no consideration is made for people on sidewalks or liminal spaces that are not directly tied to a specific structure.

- TxDOT provides the definitions of reasonable and feasible with regard to noise abatement, but these definitions are founded upon the modeled receivers as the beneficiaries of sound abatement, as if the purpose of sound abatement were the reduction of noise on a piece of property. TxDOT should reconfigure their definitions of feasibility and reasonableness with regard to noise abatement measures so that they reflect the purpose of those measures, limiting the damage done to the hearing of actual persons in the vicinity of the highway, and then re-examine the planned project for ways to reduce the experienced decibels of noise along the highway corridor.
- The principal source of noise reduction that TxDOT records in the modeling is based on depressing sections of the highway, however the validation methods for sound modeling do not include depressed highway sections, and TxDOT should demonstrate that the substantial reduction in effective sound at most receivers gained through depressing the highway that the model shows is consistent with real-world data through another set of validation tests along real-world depressed highway sections.

Economic Development

- Do not proceed with this project until there is a complete cost / benefit analysis, outlining all direct, indirect, and cumulative impacts to the city of Austin.
- Redesign the highway so that it is no higher and wider than today, including narrowing the right of way to make room for substantial economic development.
- Study the opportunity cost of letting the hundreds of acres in this corridor continue to be used for a single purpose with no tax revenue back to the public before proceeding with any project. The Texas Transportation Institute (TTI) study of community alternatives only evaluated anticipated project cost and completely ignored potential economic development and resulting revenue streams. Without considering the opportunity cost of what could be prime urban land being used for a highway, the project's cost can be presented as the cost of construction alone, thus hiding immense amounts of lost revenue from an expanded tax base and preventing a real comparison of economic futures.
- I-35 traverses the most valuable downtown real estate, and this land could be better used in the long term for producing housing, jobs, and tax revenues.
- Instead of expanding the highway, TXDOT should be looking for ways to shrink the highway and allow property owners to develop that land for new businesses and homes. In fact, a pro-business proposal would expand the tax base and usable land in our city, not erode it further.
- Reconnect Austin's vision demonstrates a path forward where the highway can (and should be narrowed), buildings could be built on valuable land returned to the City of Austin, and community-serving uses could be constructed. New tax revenue, on land that currently pays no taxes, would benefit the State of Texas, the City of Austin, Travis County, the Austin Independent School District, and Central Health.

Safety

- Prioritize safety over speed.
- The Purpose and Need for this project clearly states there is a need to provide safer and more continuous accommodations for bicyclists and pedestrians within the project corridor.
- This project should not move forward until it can demonstrate that it meets both the City of Austin's Vision Zero goals and TxDOT's Road to Zero goals.
- 25% of traffic fatalities in the entire City of Austin occur in this right of way. I-35 must be redesigned to significantly improve safety.
- 40% of traffic fatalities and serious injuries in the current I-35 corridor involve people who were walking, riding bicycles, using assistive devices, or using micro mobility devices. This is a direct result of the failures of the current I-35 design, especially with regard to non-vehicular use of the space, and a redesigned I-35 must make concessions for all users of the space, rather than treating regular and preventable deaths along highway corridors as a fact of life or 'the cost of speed'.
- 74% of traffic fatalities in the entire City of Austin occur in TxDOT owned and operated rights of way. The Texas Transportation Commission and TxDOT should prioritize transportation safety for all citizens of the State of Texas.
- The first stated goal of the TxDOT I-35 Capital Express Central Project was to enhance safety, however, significantly more energy and materials within the Virtual Public Meeting from 11/12/20 was spent describing current travel time issues than current safety issues, despite safety issues resulting in a profound loss of life. Safety is better addressed in documents today, but only after City of Austin staff and local community advocates pointed out safety issues and requested that safety be better addressed by this project.
- TxDOT's analysis focuses heavily on the costs of congestion, but ignores the costs of fatalities and serious injuries in the I-35 corridor, and all of their rights of way within the City of Austin.
- The project Alternatives Evaluation Criteria included the annual cost of delay but did not include the annual cost of traffic crashes. Again, without clear measurement and analysis of these otherwise hidden concerns, it is impossible to make an informed decision about I-35, and thus TxDOT should prioritize studying and analyzing traffic fatalities to better understand the reality of the project as envisioned.
- In urban areas at the surface, TxDOT should set speed limits which match the local street network and which follow NACTO's guide "[City Limits: Setting Safe Speed Limits on Urban Streets](#)."
- Austin needs more multi-modal, East/West connectivity, than the current project proposes.
- Use portal ramps or other modern ramping that is safe for people and supports the urban fabric. See examples in the City of Austin memo dated 9/23/2021.
- Remove ramping that is preventing additional connectivity and capping.
- Design speeds on the highway and HOV lanes should not exceed 50 mph. Lower design speeds are safer, pollute less, reduce the need for long ramps, and are more compatible with the urban environment. Highways in urban areas across the U.S. are designed with 50 mph design speeds. Design speed and posted speed should match.

- All controlled access facilities should be designed with similar up to date design guidance, preferably NACTO guidance, with sufficiently low target, posted, and design speeds for a dense urban context and to allow seamless and safe integration with a safe, multimodal urban street grid.
- The City of Austin 2014 Bicycle Master Plan envisions a core network of safe facilities suitable for people of all ages and abilities (AAA network), and approximately three quarters of the streets that cross this project corridor have been identified as being in the Bicycle Priority Network.
- TxDOT's environmental and design process could have been an opportunity to incorporate the most up to date safe design approach including incorporating: discontinuing the outdated practice of using the 85th Percentile Rule; determining target speed, design speed, and posted speed in the context of the urban environment (as stated in the Texas Strategic Highway Safety Plan); follow the lead of the City of Austin, where speed management includes safety proposals to use speed limits and design speeds appropriate to context.
- In urban areas, TxDOT should provide safe crossings for pedestrians and bikes at least every ¼ mile along the corridor. I-35 limits local commerce because crossings are too far apart. When crossings are too far apart, pedestrians will sometimes enter the mainlanes to make an unsafe crossing. This is only one instance of the direct relationship between design considerations and injury or fatality for those living near a highway, and TxDOT's plans for the highway must demonstrate an understanding of this relationship in order to make meaningful quality of life improvements for those most vulnerable to highways.
- TxDOT should plant trees between the pedestrian/bike realm and the drive lanes, typically between the clear zones and shared use paths (SUPs). Trees provide shade, evaporative cooling, help mitigate air pollution, and physical protection for pedestrians when cars exit the roadway.

Design

- Build a continuous cap from south of Cesar Chavez to north of Airport Blvd.
- The proposed build scenarios do not increase connectivity across I-35.
- Build a two-way urban boulevard, to Great Streets standards, from south of Cesar Chavez to north of Airport Blvd.
- Do not use SPUIs in this corridor. Single Point Urban Intersections (SPUIs) do not belong in an urban environment. These intersections prioritize high-speed traffic across the highway, while Austin is working hard to reduce vehicular speed and increase safety on City streets. Trying to force people into tunnels to cross Riverside or Airport, and leaving them no safe crossing options at the surface, is a recipe for disaster.
- Create safe and comfortable crossings for all modes of transportation and all people.
- The State of Texas recently turned N. Congress Avenue into a world-class pedestrian mall lined with multi-use buildings. This is the kind of design thinking we need for the surface level of I-35.
- Design all surface streets to the City of Austin adopted Great Streets standards.

- All project elements that are not controlled access facilities should be designed as safe, multimodal facilities with target, posted, and design speeds of 25 mph or less and designed to match the existing City of Austin street network.
- TxDOT should work with the City of Austin to design all surface elements as city streets with high-comfort bike lanes, quality pedestrian access, no slip lanes, and crossings that do not span more than 2 lanes.
- Provide street furniture and amenities (such as lighting, benches, and water fountains) on the sidewalk.
- Austin's urban trails are important transportation networks that tie into our on-street sidewalk and bike lane networks. These are necessary transportation connections and should always be considered as a transportation network that must be prioritized with connected facilities and safe ways to cross major roadways.
- Highway profiles, renderings and 3D modeling graphics should be provided to the public to better understand this huge and complex project.
- TxDOT should collaborate with urban design experts to program small spaces in and around the highway. This would humanize spaces and reduce fear of huge infrastructure cutting through the prime urban areas of the city.
- The I-35 Capital Express Central Project should continue to collaborate and prioritize reducing the environmental, traffic, and safety impacts of I-35, especially the frontage roads. Frontage roads and east west crossings should prioritize service to the local street network and should have speed limits and design speeds no higher than the adjacent local street network.
- TxDOT's Modified Build Alternative 3 design largely focuses on single-occupancy vehicle trips. The balance in planning and designing for other modes of transportation is skewed.
- Smaller footprint of I-35 will result in better utility of urban areas of central Austin.
- The bicycle/pedestrian bridges over Lady Bird Lake, on either side of the vehicular bridges, should be designed by professionals who understand placemaking. Designers should study and understand, perhaps even walk, the excellent and well-loved designs of the Pfluger Bridge and the Lady Bird Lake Boardwalk. There is an opportunity here for the bridges to be well-designed, moved further away from traffic pollution and noise, have shade structures, have dwell spaces with benches, have better lighting for safety, and better connect to our existing trail facilities.
- The current Modified Alternative 3 designs present serious concerns for the safety and mobility of non-vehicular network users, including:
 - Poor east-west mobility, crossings, and access to caps;
 - Slip lanes proposed at a number of intersections that see high pedestrian and bicyclist traffic;
 - Single Point Urban Intersections (at Riverside and Airport) are designed so that pedestrians have to cross in underground tunnels;
 - Extensive curb cuts where instead at-grade driveway crossings and contiguous sidewalk treatments are generally recommended;
 - No indication of plans for pedestrian-leading intervals at all signalized intersections;

- No physical barriers planned between high-speed facilities and proposed Shared-Use Paths;
- Allow street trees in all locations at the surface: frontage roads (between moving traffic and shared use paths), bridges, caps, etc.
- Shared Use Paths are still within clear zones in some locations and are not protected from vehicles that might leave the roadway.
- Design speeds for the highway lanes, frontage roads, and boulevard are too high. We recommend design speeds for highway lanes should be no higher than 50 mph, and frontage roads and boulevard no higher than 25 mph;

Transportation

- TxDOT has an obligation to adhere to adopted key provisions in every major City of Austin plan, including the Imagine Austin Comprehensive Plan, Austin Strategic Mobility Plan, City of Austin Vision Zero goals, Austin Street Design Guide, City of Austin Great Streets Master Plan, and Austin Climate Equity Plan.
- Future-proof this corridor for future local, commuter, and inter-city transit.
- TxDOT should build passenger rail in this corridor to address travel demand and to help reach the mode shift goals in both the Austin Strategic Mobility Plan and the Austin Climate Equity Plan.
- Switch the highway designations and tolling structure with SH130 so that long distance traffic is incentivized to use SH130. TxDOT's own pilot programs and the report TxDOT commissioned for the Texas Transportation Institute demonstrated that through traffic, especially long-haul trucks, will move over to SH130 if there is a financial incentive. It is not common sense to use the financial structure to encourage long distance vehicles to go through central Austin.
- Reconnect Austin is grateful to Austin's Mayor Kirk Watson, who, as senator, had TxDOT run the pilot programs showing this strategy was successful.
- Moving large trucks out of the center city would ease congestion, improve air quality, and significantly improve safety for other road users.
- In at least 14 other Texas towns and cities, I-35 runs around and not through those places' central business districts, a practice common with highways across the US.
- Increased connectivity across the corridor is necessary for existing and future local bus, bus rapid transit, and rail operations.
- Traffic modeling should not assume an annual percentage increase with no feedback loop to account for human behavior. Smart Mobility conducted an analysis of the flaws in both the Capital Area Metropolitan Planning Organization (CAMPO) traffic model and the more detailed modeling conducted for this corridor. Over-inflated traffic models intentionally skew future traffic projections, air quality modeling, greenhouse gas emissions modeling, and noise modeling. The Smart Mobility report is attached and resubmitted herein. The Smart Mobility report has been previously submitted, on the record and multiple times, but is consistently ignored by TxDOT.
- Transportation professionals agree that transportation is a supply and demand system. This build project addresses supply, but ignores demand. Transportation Demand Management (TDM) is the best tool for solving congestion, while data show that

widening highways does not solve congestion. TDM deserves a robust analysis as part of this DEIS.

- Many studies, including Transportation For America's Congestion Con report, affirm that widening highways merely induces more driving and offsets short term congestion gains while impacting safety, air quality, noise, and other environmental and quality of life aspects and is therefore not an effective transportation measure.
- Data from across the U.S., and over multiple years, show that Austin will never be able to build its way out of congestion. Federal Highway Administration (FHWA) and the Texas Transportation Institute (TTI) data, from 1993 to 2017, show that in every case where highway lanes were expanded, traffic delay increased, far outpacing population growth. These data show that Austin's population grew by 125%, freeway lane miles grew by 98%, and congestion delay grew by 461% (Congestion Con, pg. 12).
- TxDOT staff, in a public briefing to Austin's City Council on 8/30/2021, clearly stated that they know this project will not relieve congestion.
- Over the last 20 years, TxDOT has been projecting that I-35 will carry 330K vehicles, yet the AADT remains at 200K. I-35 cannot carry 330K vehicles unless it is widened. The 330K projections in the DEIS are false, and the project should be reevaluated with existing traffic counts instead of inflated traffic counts.
- Redesign any improvements to minimize induced demand, vehicle miles traveled, and the resulting pollution. This would include a robust study of induced demand - which TxDOT has not done. This study should look at increases in VMT, and realistically assess both current and future pollution. Do not simply assume electric vehicles will solve these issues.
- TxDOT included a presumption of increased travel time and already projected for expansion, which negates the commitments to reduce travel time, the Road to Zero Initiative, and Vision Zero.
- Active transportation and transit projects are needed to improve safety for the most vulnerable users of our transportation network, to increase connectivity of our sidewalk, bicycle, and trail systems, and to provide alternative transportation options beyond single occupancy vehicle trips.
- CapMetro'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.
- 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.
- In order for transit services, walking, and biking to successfully operate along and across the I-35 corridor, there must be additional connectivity and additional capping. The Austin Strategic Mobility Plan plans for a significant mode shift, and this project should support those goals.
- Adding more motor vehicle traffic to state and local streets in Central Austin will result in a poorer experience for all road users & residents, including those driving, walking, bicycling, taking transit, living at home, working at offices, and a less safe experience for those walking and bicycling on those streets.

Equity

- I-35's origins are the result of racially discriminatory practices, impacts that continue to have disproportionate impacts on communities of color.
- This portion of I-35 was constructed before NEPA was signed into law in 1971 and was constructed in the absence of community input and robust environmental regulations. These practices have negatively impacted communities living near I-35 for the last 70 years.
- The City of Austin, Travis County, TxDOT, and the Capital Area Metropolitan Planning Organization (CAMPO) have an obligation to consider past inequities and potential disproportionate impacts of project alternatives and mitigate negative impacts through equitable planning processes and outcomes.
- Funding from CAMPO for I-35 Cap Ex Central, \$633 Million taken from projects throughout the region, should be returned to CAMPO for those deferred projects until the current project is improved.
- TxDOT's preferred alternative, Modified Alternative 3 will cause significant displacement of existing homes and local businesses, many of those residents and businesses owners / employees are from disadvantaged communities.
- TxDOT should minimize displacement.
- TxDOT should return some of its highway land by establishing community land trusts. These trusts would serve as reparations to economically disadvantaged people who have been burdened by dangerous Texas highways for generations.
- The impact of serious injuries and fatalities in this project corridor have been inequitable, disproportionately affecting people of color, individuals experiencing homelessness, and other marginalized communities.
- This project will further entrench a car culture that disproportionately burdens low income communities of color; socially isolates community members; perpetuates car-centric land use, practical, and cultural systems in which car ownership is necessary to fully access opportunities.
- Mitigation strategies for I-35 are only being applied downtown and at UT Austin. The mitigation strategies should be applied throughout the project corridor. Shared use paths along frontage roads are unprotected from moving traffic, behind a 4-foot clear zone. This project would be much improved with street trees, which provide protection from moving traffic, shade for people in our hot climate, and help mitigate increased air pollution from adding lanes.
- The quality of ADA (Americans with Disabilities Act) access needs to be prioritized. Current ADA access in this corridor is abominable and should have been brought up to standards where ADA was passed over 30 years ago.
- All of the current alternatives proposed by TxDOT, including the No-Build alternative and the preferred alternative, have significant externalities that will require extensive mitigation.

Once again, Reconnect Austin is asking for the community alternatives to be studied in the NEPA process. We have been making that same request for 11 years. Reconnect Austin and Rethink35 were studied by the Texas Transportation Institute (TTI), but that analysis was rushed and left out important elements of review, including any cost/benefit analysis. The TTI study was then used to exclude community alternatives from full evaluation and consideration under NEPA.

We recognize that I-35 is dangerous, polluting, loud, harms people, diminishes economic development opportunities, is completely out of context with the surrounding city, is used as a tool to segregate communities, and needs to be brought into the 21st Century. Working together we have a once in a lifetime opportunity to rebuild I-35. If we can get this right, I-35 can be an example for other cities across the country and the world.

Thank you,

Reconnect Austin

Attached: Smart Mobility, [Valid Modeling of the I-35 Capital Express Project](#)

CC:

U.S. Representative LLOYD Doggett
Cat McCoy, Office of Lloyd Doggett
U.S. Representative Greg Casar
Braden Latham Jones, Office of Greg Casar
Pete Buttigieg, U.S. Secretary of Transportation
Polly Trottenberg, Deputy Secretary of Transportation
Shailen Bhatt, Administrator of the Federal Highway Administration
Stephanie Pollack, Deputy Administrator of the FHWA
Gloria Shepherd, Executive Director of the FHWA
Executive Secretariat at FHWA
Al Alonzi, FHWA, Texas Division
Texas Governor Greg Abbott
Texas Transportation Commissioner Bruce Bugg
Texas Transportation Commissioner Alvin New
Texas Transportation Commissioner Robert Vaughn
Marc Williams, Executive Director, TxDOT
Tucker Ferguson, District Engineer, Austin District
Tommy Abrego, I-35 Program Manager, Austin District
Heather Ashley-Nguyen, Transportation Planning and Development Director, Austin District
Senator Sarah Eckhardt
Senator Judith Zaffirini
Representative Gina Hinojosa
Representative Sheryl Cole
Representative Donna Howard
Representative James Talarico

Representative Lulu Flores
Mayor Kirk Watson
Council Member Natasha Harper-Madison, D1
Council Member Vanessa Fuentes, D2
Council Member Jose Velasquez, D3
Council Member Chito Vela, D4
Council Member Ryan Alter, D5
Council Member Mackenzie Kelly, D6
Council Member Leslie Pool, D7
Council Member Paige Ellis, D8
Council Member Zohaib Qadri, D9
Council Member Alison Alter, D10
Travis County Judge Andy Brown
Travis County Commissioner Jeff Travillion
Travis County Commissioner Brigid Shea
Travis County Commissioner Ann Howard
Travis County Commissioner Margaret Gomez
Ashby Johnson, CAMPO
Jesus Garza, City Manager, City of Austin
Robert Goode, Assistant City Manager, Mobility
Richard Mendoza, Director, Austin Transportation Department
Mike Trimble, Corridor Program Office
Lynda Rife, Rifeline
Frances Jordan, Rifeline
Peter Einhorn, Office of Senator Eckhardt
Stefan Silveira, Office of Senator Eckhardt
Kristen Ylana, Chief of Staff for Rep Howard
Kate Alexander, Mayor's Office
Ashley Richardson, District 10
Sara Barge, District 9
Caleb Pritchard, District 9
Melissa Beeler, District 9
Julie Montgomery, District 8
Louisa Brinsmade, District 7
Ben Leffler, District 5
Sobeyda Gomez-Chou, District 4
Timothy Bray, District 4
Jenna Hanes, District 4
Yuri Barragon, District 3
Lizette Melendez, District 3
Amelia Casas, District 2
Jason Alexander, District 2
John Lawler, District 1
Nikki McCullough, District 1



TxDOT Cap Ex Central: Round-1

31 December 2020

Website: <https://reconnectaustin.com/>
Email: reconnectaustin@gmail.com



Date: 12/31/2020

Re: I-35 Capital Express Central Project

To: Project Team

Transmitted via Email: My35capex@txdot.gov

Transmitted via Letter: 1608 W. 6th St., Austin, TX 78703

[Reconnect Austin](#) respectfully submits the follow comments to be documented during scoping and considered through the development of the I-35 Cap Ex Central Project.

[Reconnect Austin](#) is a grassroots groups of community leaders which has been working with neighborhood and community, elected official, the City of Austin, and TxDOT since TxDOT took over this project in November 2012. In those 8 years we have consistently advocated for a better I-35 in central Austin, throughout leadership changes at the federal, state, and local levels, changes in TxDOT leadership, changes in Austin District Engineers and I-35 Project Managers, and so many different TxDOT consultants we have lost count. Despite years of study and discussion, including a broad range of strong community input during the 2016 NEPA review, many of the same issues remain unaddressed.

[Reconnect Austin](#) and its members have participated in a variety of organized efforts to formulate a plan for I-35, including:

- Multiple community and neighborhood group meetings
- TxDOT's Downtown I-35 Stakeholder Working Group and associated deep dives
- TxDOT's I-35 Aesthetic Working Group
- Downtown Austin Alliance's Mobility Committee
- Downtown Austin Alliance's I-35 Taskforce
- Urban Land Institute Austin's Transportation Committee
- Urban Land Institute's Technical Assistance Panel
- City of Austin Bicycle / Pedestrian Advisory Council Active Mobility Working Group
- Cap Metro Project Connect MCCAC and PCAN
- OurFuture35 Scoping Working Group

[Reconnect Austin](#) has donated considerable time and expertise to reimagining the I-35 corridor and plans to continue to participate in this process. With that in mind, we offer the following 21 key concepts, which we believe must be addressed in 2021:

1. TxDOT must address past racial injustice. I-35 was intentionally located next to redlined neighborhoods in East Austin, walling them off from other areas of the city. Widening I-35 and increasing the daily traffic will increase the negative and harmful impacts on these

communities. I-35 should not be widened to benefit some while harming those who live adjacent to this highway. A full equity assessment is needed.

2. TxDOT must thoroughly document existing, and adequately model future, environmental impacts. Much of the air pollution, noise pollution, flooding, and poor water quality caused today by I-35 has gone undocumented. TxDOT should fully understand the existing conditions, and then model all future impacts. Vulnerable populations live near I-35 and are disproportionately impacted by the presence of I-35. Create transparent reporting of methodologies, measurements, and analysis of impacts. Both a full health impact assessment and a full environmental impact assessment are needed.
3. TxDOT must plan this project in coordination with the City of Austin, Cap Metro, and the Austin Transit Partnership. Austin voters went to polls on Nov. 3, 2020 and voted to tax themselves to pay for an expanded transit system. Project Connect is critical to moving people efficiently and any changes to I-35 should prioritize transit access, operations, and be designed to accommodate all future transit needs (including headroom for future rail).
4. TxDOT must use more accurate traffic modeling. Current traffic modeling is based on over-inflated projections. Projections from 2002, which predicted future traffic levels in 2020, are still substantially higher than current average daily trips (in 2020).
5. TxDOT must work to address travel demand. Plans focus solely on supplying more infrastructure. Highways are a supply and demand system. We have seen with COVID-19 stay at home orders that changing demand reduces congestion, doing so more successfully than adding free highway lanes. The TTI Mobility Investment Priorities Project, conducted with TxDOT direction, clearly modeled demand management strategies, which showed more success in alleviating congestion than only widening I-35. Demand management strategies to consider: never adding new non-tolled capacity, creating transportation choices, making the transit trip more beneficial and attractive than the driving trip, building more housing near job centers, as well as work from home (which has successfully eliminated congestion during COVID).
6. TxDOT must seriously study a designation switch with SH 130. In 2011 the Texas Transportation Commission appointed the I-35 Corridor Advisory Committee, which recommended redesignating SH 130 from Georgetown to SH 45 SE as I-35. This recommendation should no longer be ignored. Traffic will need to move off of I-35 for construction, this is the opportunity to move through trips permanently to SH130.
7. TxDOT must follow its Road to Zero policy. Annually 25% of traffic deaths in the entire City of Austin occur in the I-35 corridor. That is unacceptable. TxDOT should be doing everything within its power to lower the death toll, including lowering design speeds on the main lanes and on any remaining frontage roads outside of the urban core. Lower design speeds would save lives, reduce the overall footprint, and shorten entrance and exit ramps.

8. TxDOT must prioritize safety for all road users, protecting all human life in the transportation system, as called for in the Austin Strategic Mobility Plan. All highway lanes, roads, streets, boulevards, and bridges should be designed with safety as a real, measurable, and implemented priority. This includes safety for all road users and all modes in the corridor, significantly improving east/west connectivity.
9. TxDOT must allow the City of Austin to design all surface streets and roads. Surface streets and roads are urban transportation systems that need to serve all users and should be integrated into the city's transportation network. City of Austin design guidelines and NACTO standards must be applied to surface level streets and roads.
10. TxDOT must consider all alternatives for I-35. NEPA allows the agency to consider and evaluate community alternatives. Any NEPA review should fully consider: ULI I-35 recommendations, Rethink35, and Reconnect Austin. The Reconnect Austin vision is outlined in our report - *Reimagining I-35* - which is included with this submission.
11. TxDOT must provide real alternatives. The current alternatives, as presented, are very difficult to understand (the drawings are not dimensioned) and lack considerable detail. The community cannot make a carefully considered decision without a NEPA process that puts forward carefully considered alternatives, including those that have originated in the community: ULI recommendations, Rethink35, and Reconnect Austin.
12. TxDOT must address safety in meaningful ways. The Purpose and Need does not adequately address safety for all road users.
13. TxDOT must respect and follow local policy direction. The City of Austin has set strong policy direction for transportation and any transportation facilities within the city, including I-35, should follow that direction. Any future I-35 should help the City of Austin achieve its stated policies and goals for the transportation network. This includes policies outlined in:

Austin Strategic Mobility Plan

- Mode split goals by 2039: 50% drive alone, 16% transit, 14% telework, 11% carpool/taxicab/other, 5% bicycle, 4% walk
- Reduce the amount of time workers spend traveling between home and work
- Build a transportation network that encourages social interaction
- Promote a balanced transportation network
- Promote economic growth for individuals and the city through strategic investments in transportation networks
- Lower the cost of traveling in Austin by providing affordable travel options
- Lower the risk of travel-related injury and promoting public health
- Draw inspiration from forward-looking cities around the world, change the way we think about what is possible, and set an example for the rest of the country

Imagine Austin Comprehensive Plan

- Public and private sectors work together to improve our air quality
- Support public transit and a variety of transportation choices, while reducing sprawl, congestion, travel times, and negative impacts on existing neighborhoods
- Safe bicycle and pedestrian access with well-designed routes that provide connectivity throughout the greater Austin area
- Ensure that growth is both fiscally sound and environmentally sustainable

Great Streets Master Plan

- Create an environment that is safe, generous enough for multi-purpose use, and sheltered from the elements
- Calm traffic movement in downtown; accommodate automobile traffic to downtown and discourage traffic through downtown
- Recognize the primacy of the grid in the downtown and optimize its use

Vision Zero Goals

- Zero annual vehicular-related deaths and serious injuries within Austin city limits

Austin Street Design Guide

- All project elements that are not controlled access facilities should be designed as safe, multimodal facilities with target, posted, and design speeds of 35mph or less
- NACTO guides, such as the Urban Street Design Guide, should also be used as additional design guidance for all elements of the project that are not controlled access facilities
- All controlled access facilities should be designed with similar up to date design guidance, including the most recent AASHTO Green Book, with sufficiently low target, posted, and design speeds for a dense urban context and to allow seamless and safe integration with a safe, multimodal urban street grid

Austin climate goals as set forth in Austin City Council Resolution 20140410-024

- Net zero community-wide greenhouse gas emissions by 2050

14. TxDOT must rebuild I-35 in a way that creates more vibrant, prosperous, and resilient communities. While creating a new design for I-35, TxDOT should simultaneously work with the City of Austin to create policies that:

- Increase dense, walkable, mixed-use, and equitable transit-oriented development along I-35 from which people of all types of age, gender, skin color, income level, and physical ability can equally benefit and access.
 - Close socioeconomic gaps between different communities through tools such as value-capture programs to harness increased revenues from improvements to I-35 to help build local wealth, enhance and protect historic and cultural resources, and prevent displacement.
 - 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.
 - Maximize socially, economically, and environmentally beneficial land use by evaluating how much land should be used for mobility right-of-way and how much should be used for other uses such as affordable housing, local businesses, and public space, such evaluation including the consideration of a road/highway diet and other land use measures.
15. TxDOT must provide a full economic cost accounting for all direct, indirect, and cumulative impacts identified in this scoping recommendation, including deaths and serious injuries, of the current I-35 configuration and of the various fully considered alternatives. A full economic impact analysis is needed.
16. TxDOT, the City of Austin, and other agencies must work together to:
- Maximize safety for all transportation modes
 - Maximize street network connectivity, including equally facilitating east-west and north-south travel
 - Reform land use policies, including increased density and mixed-use zoning for neighborhoods
 - Implement Travel Demand Management strategies
17. TxDOT must collaborate with local and regional partners. On its own, TxDOT cannot deliver the project the business community and residents envision. TxDOT must work with local and regional partners, including the City of Austin, Capital Metropolitan Transportation Authority, the Capital Area Metropolitan Planning Organization, and organizations such as the Downtown Austin Alliance, the Austin Chamber of Commerce, and the Real Estate Council of Austin. All entities must work together to create a project that benefits the various interests and needs of stakeholders.
18. TxDOT must focus on access rather than speed. I-35 must be designed to serve Austin's economy as much as it serves that of the region and nation. This means that any proposed improvements should prioritize local access to business and activity centers, including downtown Austin, the Capitol Complex, and The University of Texas, over the speed of vehicles and trucks moving through the region.

19. TxDOT must work closely with the University of Texas at Austin to maximize the opportunity to reconnect the university campus and create new buildable land for Texas' flagship university.
20. TxDOT must recognize the opportunity to capture value in this corridor. There are approximately 136 acres of TxDOT right of way between Holly St. and Airport Blvd. This land represents an enormous opportunity to create valuable tax base and reconnect the city. That opportunity must not be ignored. The segment of I-35 from the river to Airport Boulevard must be capped. The cap allows the reintegration of Austin with East Austin, and also allows for the major problems of air and noise pollution to be adequately mitigated. By sinking the freeway and capping it through downtown and the upper decks, and by combining existing frontage roads into a civilized urban boulevard, we can create a human scale, walkable, mixed-use boulevard. By doing so, Austin would enjoy several billion dollars of enhanced tax base to pay for the cap with a tax increment bond. That bond would be easily paid off in less than 20 years, and the investments would flow from the taxes in perpetuity.
21. TxDOT must 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. Information supplied to the public must be transparent and easy to understand by lay people. The public must be provided all interim reports related to traffic modeling, climate change modeling, alternative designs, engagement outcomes, and other assessments.

On this New Year's Eve 2020 we want to extend our thanks for your attention to these 21 areas of concern. We look forward to working with your team in 2021 to fully realize this once in a lifetime opportunity to transform the I-35 corridor.



TxDOT Cap Ex Central: Round-2

9 April 2021

Website: <https://reconnectaustin.com/>
Email: reconnectaustin@gmail.com



Date: 4/9/2021

Re: I-35 Capital Express Central Project

To: Project Team

Transmitted via Email: My35capex@txdot.gov

Transmitted via Mail: Attn: Project Team
1608 W. 6th Street
Austin, TX 78703

[Reconnect Austin](#) respectfully submits the follow comments to be documented during Virtual Scoping Meeting #2 and considered through the development of the I-35 Cap Ex Central Project.

[Reconnect Austin](#) is a grassroots groups of community leaders which has been working with neighborhood and community members, elected officials, the City of Austin, and TxDOT since TxDOT took over this project in November 2012. In those 8+ years we have consistently advocated for a better I-35 in central Austin, throughout leadership changes at the federal, state, and local levels, changes in TxDOT leadership, changes in Austin District Engineers and I-35 Project Managers, and various TxDOT consultants. Despite years of study and discussion, including a broad range of strong community input during the 2016 NEPA review, many of the same issues remain unaddressed.

[Reconnect Austin](#) and its members have participated in a variety of organized efforts to formulate a plan for I-35, including:

- ☐ Multiple community and neighborhood group meetings
- ☐ TxDOT's Downtown I-35 Stakeholder Working Group and associated deep dives
- ☐ TxDOT's I-35 Aesthetic Working Group
- ☐ Downtown Austin Alliance's Mobility Committee
- ☐ Downtown Austin Alliance's I-35 Taskforce
- ☐ Urban Land Institute Austin's Transportation Committee
- ☐ Urban Land Institute's Technical Assistance Panel
- ☐ City of Austin Bicycle / Pedestrian Advisory Council Active Mobility Working Group
- ☐ Cap Metro Project Connect MCCAC and PCAN
- ☐ OurFuture35 Scoping Working Group

[Reconnect Austin](#) has donated considerable time and expertise to reimagining the I-35 corridor

and plans to continue to participate in this process. We do sincerely appreciate edits that were made to the Purpose and Need, especially those relating to safety in this deadly corridor. We also appreciate the opportunity to comment on the newly presented evaluation criteria.

Reconnect Austin would also like to thank TxDOT staff and consultants for meeting with us and for answering detailed questions at our virtual meeting on Tuesday, April 6th. The minutes from that meeting are attached for reference and as part of the public record.

Regarding the [Evaluation Criteria](#), there are criteria that are either missing or the language needs to be further fleshed out in each of the following categories:

1. Purpose and Need

- a. Add a Criteria that addresses travel time, and access, for transit riders, people walking (including with assistive devices like wheelchairs), and people biking. You have criteria for people driving, but not for other users. Many highway treatments that support faster car trips are detrimental to travel time for other users.
- b. Add a Criteria that addresses Annual Cost of Traffic Injuries and Fatalities. You have criteria for annual cost of delay, but traffic injuries and fatalities also have significant associated costs. This criterion should include Years of Life Lost.
- c. Add a Criteria that addresses compliance with ADA (American with Disabilities Act).
- d. Add a Criteria that addresses racial inequities, harm to vulnerable populations, and transportation justice.
- e. Under “Improved East-West Connectivity” the criteria should read “improve and increase.”
- f. Under “Accommodates Project Connect” the criteria should apply to “light rail and all bus routes.”

2. Feasibility, Design, Engineering

- a. Add a Criteria that addresses future transit uses, including headroom and widths for future rail.

3. Environmental Resource

- a. Add a Criteria that addresses Air Quality. This should include the potential to reduce impacts, similar to the way you have structured the Traffic Noise criteria.
- b. Under all three topics that state “Minimizing displacement,” the criteria should include long term displacement, not just ROW purchases and construction.

4. Local Enhancements

- a. Add a Criteria that addresses opportunities to maximize tax base creation and value capture in the corridor.

5. Preliminary Project Costs

- a. Add a Criteria that addresses maximizing the amount of land returned to the City of Austin for development of affordable housing and related services.

Regarding [What You Heard During Virtual Scoping Round 1](#), we have serious concerns about how the 2,300+ comments you received were documented and addressed. Specific concerns regarding each comment “theme” are noted in the attached spreadsheet, to be included as part of the public record.

In addition to specific concerns noted in the spreadsheet, general concerns are as follows:

1. This document does not include any copies of actual letter submissions. No information is provided explaining how “comment themes” were designated, or how language from comments were placed into “comment themes.” No information is provided on frequency of comments, where comments came from, or how comments from institutions were considered (ex. from City of Austin City Council and/or Mayor Adler). Several groups that submitted comments represent thousands of individuals in Austin (ex. OurFuture35 Scoping Working Group), yet those letters do not appear to be weighted any more than submissions by individuals. Much more detailed information is needed beyond this document to explain the comments received in Round 1 of public engagement.
2. Do “comment theme” responses intend to respond to every comment received by TxDOT referring to the stated topic? For example, is comment theme #1 intended to respond to every comment submitted regarding air quality? More information is needed on this. If not, when and how will TxDOT respond to the comments that were ignored / overlooked?
3. Several comment themes do not accurately portray known submitted comments. See an example of this in Comment Theme and Reconnect Austin response #3. This is a misrepresentation of community comments. The structure of this document lends itself easily to misrepresenting community comments and TxDOT only responding to “comment themes,” which are not actual community comments. The NEPA process is intended to provide the community affected with a voice in the project affecting them, and conducting community engagement in this way shows that TxDOT is not valuing, or designing the project in line with, community feedback.
4. Responses which justify TxDOT’s actions as being in line with the Roadway Design Manual (RDM) are inappropriate. The RDM is very out of date and is not considered representative of modern design standards. We recommend that TxDOT replace I-35 with an urban boulevard at the surface (as proposed by Reconnect Austin and ReThink35), designed according to NACTO’s urban boulevard standards:
<https://nacto.org/publications/>
5. Several important comment themes are missing from this document. This includes crash, injury, and fatality statistics and a commitment by TxDOT to reduce injuries and fatalities in this corridor. Austin’s Vision Zero goals are only briefly mentioned in comment theme #17, to which TxDOT has replied that they are “supporting” some City

plans, “either partially or in full.” No mention is made of the Texas Transportation Commission’s commitment to reach zero traffic fatalities and serious injuries by 2050. Reducing crashes and serious injuries is a major issue in this corridor, and its lack of inclusion in TxDOT’s comment responses document is both ignoring known submitted public comments and neglecting an extremely important discussion in the future of this project.

6. There is no comment theme on connectivity. For more than 20 years, the community has been asking for better East/West connectivity. Comments related to connectivity are not fully and accurately portrayed in this document. The current alternatives show no new East/West connectivity over what exists today. While we appreciate the possible addition of 5th St., it is important to note that a full and continuous cap, with a boulevard to replace frontage roads, would allow for full connectivity at every East/West street instead of replicating the limited connectivity we have today.
7. Several of TxDOT’s responses to comment themes reference specific studies, but they do not include links to those studies so that a reader can look into the material further. They also do not explain how the project and its alternatives have been, and will be as this project continues, developed in line with the findings from the studies. This makes it extra difficult for a layperson (or a community member who is not a transportation professional) to understand the response and its justification, and how the response answers their comment.
8. TxDOT has engaged in several rounds of community engagement beyond the official periods set in the NEPA process. TxDOT should compensate community members for their participation in public engagement, and for their time, expertise, and resources used in this project. The budget for this project should dedicate funds for financial compensation to community members for their time and energy.
9. Several of TxDOT’s responses reference future community workshops as part of how the project will be evaluated. However, this does not explain why previously submitted community feedback and recommendations are being ignored. Future community engagement does NOT justify ignoring previous/existing community engagement. OurFuture35 Scoping Working Group, which represents 50+ community organizations and institutions and is primarily made up of people of color in East Austin, sent in a letter with several recommendations to TxDOT during Round 1 of public engagement. That letter, and its recommendations, were ignored. Future community workshops are not valuable if existing community feedback is not valued or considered.
10. We request that TxDOT fully considers community alternatives from Reconnect Austin, ReThink35, and ULI as official design alternatives for the EIS process.
11. Air quality along I-35 is one of the worst in the city. When questioned about whether TxDOT had collected any data about air quality along I-35 as it stands right now, they said no and that all air quality data was collected from TCEQ monitors outside of downtown Austin. See attached meeting notes from 4/6/21.

12. Given that this highway was built before NEPA, it was not built with environmental protection and conservation in mind. However, that is no excuse for TxDOT to continue to expand the modern highway. A commitment is needed from TxDOT to understand the environmental impacts of this highway, both historical and contemporary, and to mitigate those impacts going forward.
13. Hundreds of known submitted comments brought up the historic and contemporary systemic racism perpetuated by this highway. Yet in their response, TxDOT only made references to “equity.” This is inappropriate and does not adequately represent submitted comments or appropriately address the deplorable history of this highway and its modern effects on Black and Brown Austinites. TxDOT needs to explicitly address historic and contemporary racism and how this highway perpetuates it. TxDOT also has a responsibility to offer reparations to the Black and Brown communities in East Austin. Comments regarding these topics were not adequately addressed.
 - a. In May 2020, TxDOT CEO James Bass signed onto a WASHTO resolution addressing systemic racism ([Link](#)). In doing so, he agreed to hold himself and TxDOT “accountable for engaging in the daily work of combatting (sic) systemic racism.” He also “[pledged] to continue to collaborate closely with national, state, and regional organizations focused on these issues.” Where are these commitments in action? TxDOT’s neglect of the OurFuture35 Scoping Working Group’s recommendations for this project do not reflect a commitment to combating systemic racism by collaborating with local institutions and communities of color.
 - b. For more information on how to address institutional racism in highway design, see MnDOT’s “Rethinking I-94” project. From MnDOT’s website: “Construction of I-94 in the 1960s destroyed homes, disconnected neighborhoods and led to a pattern of community distrust with the Minnesota Highway Department — now MnDOT. MnDOT started Rethinking I-94 in 2016 to develop a new vision with the community. MnDOT is committed to doing better. Rethinking I-94 intends to reconnect neighborhoods, revitalize communities and ensure residents have a meaningful voice in transportation decisions that affect their lives.” ([Link](#))
14. Reconnect Austin has provided references to several reports by TxDOT or the Texas Transportation Institute that recommend switching the designations between I-35 and SH 130, and re-routing all long-distance traffic (not just trucks) to SH 130. Those studies are referenced in the attached spreadsheet, and are included here.
 - a. [Recommendation for Designation Switch by the Interstate 35 \(I-35\) Corridor Advisory Committee](#)
 - b. [TTI Report Recommending Designation Switch](#)

15. This project is based on inherently flawed transportation modeling. For more information on the problems with the modeling used in this project, and recommendations on how to solve it, see the [report](#) by transportation planning expert and owner of Smart Mobility, Inc. Norm Marshall.

We have noted that TxDOT's published timeline for this project indicates an upcoming summer 2021 open house, with another 30-day comment period. We again reiterate our request to have all public comment periods be a minimum of 90 days to afford the public time to review, understand, and comment on this complicated and extremely costly project.

Reconnect Austin does not endorse any of the provided alternatives. The alternatives all show the same vehicular capacity, number of lanes, and no additional East / West crossings. Each alternative is very similar, with Alternatives 2 & 3 being nearly identical. We again ask TxDOT to include the community alternatives - Reconnect Austin, ReThink35, and the ULI proposal – in this NEPA review.

Reconnect Austin does appreciate the opportunity to comment in Round 2. We look forward to a continuing dialogue that uses worldwide best practice and design solutions improve the Cap Ex Central project.



TxDOT Cap Ex Central: Round-3

24 September 2021

Website: <https://reconnectaustin.com/>
Email: reconnectaustin@gmail.com



September 24, 2021

Dear Tucker, Susan, and Cap Ex Central Project Team,

Thank you for the opportunity to comment on the current proposals for I-35 Cap Ex Central. We appreciate your efforts to talk with the community and to listen to community concerns. While we may not agree on everything, we can agree that this project represents a once in a lifetime opportunity to remake the I-35 corridor in a way that better balances interstate traffic needs with the needs of the City of Austin and Travis County. We recognize that this is a massive undertaking that will require considerable resources of time, money, community input, professional expertise, and patience. For those reasons we are hopeful that TxDOT will continue to work with the community, elected officials, and professional staff to ensure this project best meets the needs of the 13th largest city in the country and the place we call home.

Reconnect Austin is a community organization which works to improve the I-35 corridor through Central Austin by lowering I-35, covering it with a continuous cap, and reconnecting the city at the surface level with a new boulevard on the cap. Our goal for I-35 is to have a project that reconnects the city's downtown street grid, creates public space, minimizes the negative environmental impacts of the highway, and works to repair the historical wrongs done by the original construction of I-35. Reconnect Austin is disappointed by TxDOT's current project designs for the I-35 Capital Express Central Project released August 10, 2021 during the third round of public engagement under the Scoping phase of TxDOT's EIS process. Currently we cannot support any of the alternatives provided by TxDOT for this project.

TxDOT's current project Alternatives 2 and 3 do not represent community values as stated by community members in comments submitted during the first two rounds of public engagement in the Scoping phase and as stated during the I-35 Press Conference held September 1, 2021.

Reconnect Austin, among other community groups and individuals, does not support the project footprint currently proposed in Alternatives 2 and 3. Acquisition of over 140 properties in order to widen I-35 is inappropriate and does not represent community calls to narrow the footprint of this project. East Austin is an Environmental Justice Community, and TxDOT's current project alternatives do not take into account the historical resources which will be lost if this highway is widened at the expense of local homes and businesses. TxDOT has a responsibility to acknowledge the racist history of this highway, as well as its ongoing role in dividing the city and its disproportionate negative impacts on low-income people and people of color living near

I-35. As of September 24, 2021, that racist history and its ongoing legacy have not been acknowledged by TxDOT.

The two project alternatives currently being considered by TxDOT do not represent community wishes. Community members have repeatedly called for TxDOT to:

- Narrow the project footprint;
- Meaningfully address congestion;
 - On August 31, 2021, TxDOT Austin District Engineer Tucker Ferguson was quoted saying: "We're not pretending to say the expansion we're proposing is building our way out of congestion."
 - Transportation for America's 2020 report "[The Congestion Con](#)" shows that widening highways through urban areas does not meaningfully or permanently relieve congestion.
- Explore caps beyond the City of Austin's current Cap & Stitch proposal;
- Not displace homes and businesses along the current I-35;
- Meaningfully increase safety along the corridor for drivers, pedestrians, and cyclists;
- Create truly safe pathways for active transportation users along and across I-35, including street trees for protection from moving cars and the elimination of clear zones;
- Ensure this project will meet both City of Austin Vision Zero goals and TxDOT Road to Zero goals;
- Provide improved infrastructure for transit, pedestrians, and cyclists;
- Work with Capital Metro to ensure all north/south and east/west transit services, present and future, are well-served and in dedicated lanes;
- Lower the design speeds on the frontage roads to 25 mph through the entire project length;
- Lower the design speeds on the highway lanes through the entire project length;
- Analyze potential return on investment when land in this corridor is utilized for purposes that serve the community;
- Conduct a full and robust community equity analysis with this project;
- And conduct a full study of all existing environmental impacts (No Build) and fully disclose future environmental impacts (including but not limited to air pollution, noise pollution, pollution during construction, water pollution, impacts to park and open space).

These calls have gone unanswered by TxDOT during the entire Scoping phase of the Environmental Impact Statement. We are disappointed that TxDOT has not meaningfully addressed these community values and we call on TxDOT to meaningfully address each of these concerns as they move forward in this project.

We are disappointed in the lack of transparency regarding TxDOT's evaluation of public comments and decision-making processes. In Round 2 of public engagement (March-April 2021), TxDOT provided materials under the heading of "What We Heard From You" on their virtual project website. This page had a matrix showing common subjects in comments received by TxDOT during Round 1, and how TxDOT was responding to those comments. This document was vague and inadequately addressed public comments, but it did provide evidence that TxDOT had collected and read the comments received in Round 1. In April 2021, Reconnect Austin sent a letter to TxDOT which included a detailed critique of this comment matrix in the letter

appendix. When Round 3 of public engagement opened on August 10, 2021, there was no such comment matrix showing what comments TxDOT received during Round 2. There was no response to the evaluation matrix submitted by Reconnect Austin in April 2021. There has been no information provided, in all of Round 3 of public engagement, regarding the subject, frequency, and analysis of comments received by TxDOT during Round 2. This lack of transparency is inappropriate under NEPA and makes it extremely difficult for community advocates to understand how their voices are being listened to by TxDOT. We call for TxDOT to provide a very detailed analysis of ALL comments received during all three rounds of Scoping public engagement and data on how those comments were analyzed, responded to, and how TxDOT's project alternatives will be altered to respond to those comments.

Reconnect Austin and many other local groups have repeatedly called for all public engagement periods to extend to a minimum of 90 days, so that community organizations (many of which meet only once a month) can digest the information provided, prepare commentary, and vote on submission of that commentary to TxDOT. TxDOT has ignored these calls for all three rounds of Scoping public engagement. In December of 2020, the first round of public engagement was extended from 30 to 45 days. The second round (March-April 2021) lasted only 30 days. The third round (August-September 2021) was extended from 30 to 45 days. Reconnect Austin does appreciate these extensions of public comment. However, we wish TxDOT had planned for and provided that each public engagement period be at least 90 days so that community groups could provide meaningful commentary on the project. Groups representing thousands of Austinites have repeatedly requested more time to understand and comment on this project, including People United for Mobility Action, NCINC, The Congress for the New Urbanism - Central Texas, Red Line Parkway Initiative, Scenic Texas, Walk Austin, AIA Austin, Environment Texas, Bike Austin, and Austin Outside. Last March the Austin City Council formally requested a minimum of 60 days (Resolution No. 20210325-063).

This lack of transparency and ignoring repeated community calls for a minimum of 90 days for each public comment period make it difficult for community groups to engage with TxDOT in a supportive and cooperative manner. The City of Austin and Cap Metro worked in a true partnership to set a great example of project transparency with Project Connect. That project utilized robust community engagement to build a project from the bottom up. Its success is evident in the passing vote on Prop A in November 2020. On August 31, 2021 Mayor Pro Tem Natasha Harper-Madison aptly compared the bottom-up approach of Project Connect (and its support from the community) to the top-down approach of TxDOT's I-35 Capital Express Central (and its opposition from the community). We agree with the Mayor Pro Tem's comparison and call for TxDOT to alter its approach to this project to listen to the community first and build the project around community values.

TxDOT's current project alternatives are still not in line with current policy guidance in the City of Austin. Reconnect Austin calls for the I-35 Capital Express Central project to align fully with the following City of Austin adopted plans so as to serve the people of Austin and TxDOT's participating agencies in this project:

- [Imagine Austin Comprehensive Plan](#)
- [Austin Strategic Mobility Plan](#)

- Note the first chapter of the ASMP is “Prioritizing Our Safety” and the very first stated goal in this comprehensive and far-reaching set of adopted policy is: “Prioritize the protection of human life over all else in the planning, design, and operation of Austin’s transportation network.”
- [Austin Climate Equity Plan](#)
- [Bicycle Master Plan](#)
- [Sidewalk Master Plan and ADA Transition Plan](#)
- [Project Connect](#)

Reconnect Austin has participated in the OurFuture35 Scoping Working Group since it was first created. We have the utmost respect for this group of community representatives, including those who live and work in neighborhoods adjacent to I-35. We stand with the OurFuture35 Scoping Working Group in, again, calling for TxDOT to:

- Acknowledge the history of racist policies and actions associated with this project.
- Avoid impacts to lives and livelihoods that will be disrupted again if racial equity and justice continue to be ignored.
- Communicate clearly and continuously. The community needs to be assured of complete transparency with this project, in all stages of development.
- Provide pay for community consultants / liaisons so that community experts are rightfully compensated for their valuable time and expertise.
- Repair the harm from the generational wealth that was stripped from families when land was taken, primarily from communities of color, to create the original I-35.

The NEPA process requires TxDOT to evaluate and understand both the existing environmental impacts of this highway (No Build scenario) and the future impacts. We hope to see:

- A full and complete analysis of existing and future environmental justice impacts, including past and future displacements, historic community resources, and proposed mitigation of racist impacts.
- A full and complete analysis of switching the designations of SH 130 and I-35, which has been recommended multiple times, including from the [I-35 Corridor Advisory Committee](#) appointed by the Texas Transportation Commission in 2011.
- A full and complete analysis of all impacts associated with additional Vehicle Miles Traveled (VMT) with this highway expansion. This analysis should be done for each segment of the full Capital Express project (North, Central, and South).
- A full and complete analysis of the impacts on the environment, including air pollution, water pollution, noise pollution, additional greenhouse gas emissions, and impacts to climate change. Documentation regarding environmental impacts should use new analyses specific to this project, which compares baseline environmental quality (levels of pollution/emissions/impacts) on I-35 right now to the impacts of the proposed project alternatives. It is insufficient to respond to community calls to evaluate environmental impacts by citing old studies by TxDOT. Further, it is insufficient to not provide baseline environmental impact data. Without data on the current environmental impacts of this project, it will be impossible to fully analyze the impacts of each proposed alternative.
- A full and robust analysis of all community alternatives: DAA/ULI, Rethink35, and Reconnect Austin. While we appreciate the work of the Texas Transportation Institute, and recognize that their report was a start, TTI was not given sufficient time to

completely address all aspects of the community alternatives, including the fact all three community alternatives have a future return on investment. The report focused only on some of the project costs and completely ignored ROI, and therefore cannot be cited as a robust analysis of all community alternatives.

Since the Scoping phase of the EIS process began in fall of 2020, Reconnect Austin has been calling for TxDOT to consider the needs of the community when considering a full rebuild of I-35. While we appreciate that some aspects of the project have improved, most notably the 20-foot buffer between the shared use path and car travel lanes on bridges, there is much that warrants considerably more improvement.

All roadways at the surface of this project must be designed as and operate as city streets. The City of Austin is working hard to reduce traffic fatalities and injuries on our streets and roads. TxDOT should respect the City's plans and goals by designing all surface level roads as city streets, in partnership with Austin Transportation Department (ATD). This includes:

- The highway footprint should be narrowed to the greatest extent possible in order to shorten all crossing distances, preserve the fabric of Austin, and reconnect the city across this barrier.
- The I-35 corridor should be as safe as possible for all road users, especially vulnerable road users.
- This corridor needs many more east / west crossings in order to fully reconnect the city. TxDOT should work with City of Austin active transportation staff to leverage existing city assets, create a fully connected active transportation network, avoid eliminating existing crossings, and provide crossings at a minimum of every ¼ mile through the length of the project.
- To every extent possible, a surface level boulevard should behave as part of the local street network and support the City's Vision Zero goals utilizing existing resources including the Austin Strategic Mobility Plan, Transportation Criteria Manual, and Subchapter E of the Land Development Code.
- Transit vehicles should be prioritized in this corridor. Austinites had to vote to tax themselves to pay for Project Connect because TxDOT does not take its responsibility to provide transit seriously. Transit vehicles should be prioritized in the HOV lanes, providing reliable access to employment centers, and have multiple points to cross the corridor in fully dedicated lanes.
- The surface boulevard lanes must be designed to and posted at 25 mph speed limit throughout the length of this project. Lanes should be no more than 11 ft. wide and designed to clearly indicate to drivers that they are using a city street.
- Highway lanes, including the main lanes and HOV lanes, must be designed to and posted at 50 mph or lower. The speed on the highway lanes directly impacts the speed that people exit the highway and enter the city grid.
- Use ramping appropriate to urban contexts, including portal ramps that have been successfully used in urban contexts in Dallas.
- All surface roads and streets should include street trees (planted every 20 ft.) to help mitigate the impacts of air pollution and the urban heat island effect. Street trees are also necessary to provide shade for people and to create a protective barrier between people and moving vehicles.

- Turning radii should be tightened to slow traffic entering the city. Slip lanes should NEVER be used. The City of Austin is working to remove slip lanes from our built urban street network and TxDOT policy should be consistent with this direction.
- All roadway crossings for humans must be well-marked, highly visible to drivers, the shortest crossing distance possible, and use the most up to date standards from NACTO.
- Parallel parking should be incorporated on any surface roads to further protect humans from moving cars.
- All transit and active transportation improvements should tie into the City's and Cap Metro's networks.
- Transit planning and construction must be carefully coordinated with this project. Ideally Project Connect should be constructed first so that people have reliable travel options while I-35 is under construction.

Reconnect Austin recognizes the need for meaningful congestion relief in Central Austin. Widening I-35 and adding two non-tolled managed lanes in each direction will not meaningfully solve congestion. There is ample evidence to support this, including Transportation for America's 2020 report ["The Congestion Con."](#) TxDOT should consider alternative ways to address congestion that do not require expansion of the I-35 ROW and demolition of local homes and businesses. We call on TxDOT to consider the following methods of relieving congestion:

- Switch the designations for I-35 and SH 130. This would allow tolled lanes currently on SH 130 to be used on I-35 without violating TxDOT's moratorium on building new tolled lanes. There is ample evidence that the Designation Switch would help manage congestion along I-35. The Texas Transportation Institute Report ["Incentives for Truck Use of SH 130"](#) notes that there is considerably more truck traffic on I-35 than SH 130, but that trucks moved over when the toll on SH 130 was lowered. The report notes that trucking companies prefer to avoid toll roads, meaning that if the Designation Switch were implemented, truck traffic would be incentivized to move off of I-35, leaving room for other trips.
- Transportation Demand Management (TDM) is a proven strategy in managing congestion. The "Establishing Mobility Investment Priorities Under TxDOT Rider 42: Long-Term Central Texas IH 35 Improvement Scenarios" 2013 report by the Texas Transportation Institute proved that TDM works. That report states that "IH 35 congestion will be severe even if a substantial amount of roadway capacity (typically as lanes) is added" and that the solution to this congestion is to manage demand. The COVID-19 pandemic confirmed the findings of the Rider 42 study in practice: when demand on highways decreased due to stay-at-home orders and a sharp increase in telecommuting, congestion was drastically alleviated. The best way to manage congestion is to manage demand, not supply.
- Transit is a very effective way to alleviate congestion by utilizing TDM. Austin is working to implement an historic investment in transit through Project Connect, which will change how Austinites get around and how other modes of transportation are utilized. Demand on all roads through Austin, including I-35, will change once Project Connect is implemented. Reconnect Austin calls on TxDOT to help Austin build Project Connect in order to increase people-moving capacity through the City, and to evaluate

how Project Connect will impact demand on I-35 and the future of the I-35 Capital Express Central Project.

- Other cities in Texas have implemented transit prior to a major highway rebuild, as it is very important to have high functioning transit in place in order for people to get around while the highway is under construction and its carrying capacity diminished. Dallas utilized this strategy with its Central Expressway (I-75) by building DART in the corridor before I-75 was rebuilt. It is crucial that TxDOT provides high functioning transit service while I-35 is under construction so that people who would otherwise commute on I-35 can get to their destinations quickly, safely, and reliably.

In both 2019 and 2021, I-35 was listed in the ground-breaking [Freeways Without Futures](#) report published by The Congress for the New Urbanism. The report features 15 highways around the US that are “prime for a transformation,” due to a litany of issues with the current highway and widespread support for a progressive reimagining of the corridor. Two notable excerpts from that report:

“Everyone in Austin agrees that Interstate 35 doesn’t work. The highway was built to act as a chasm between downtown and communities of color in East Austin, and is the city’s most dangerous corridor for pedestrians. It is clear that in its current form I-35 serves no one particularly well and as the Texas Department of Transportation (TxDOT) considers what to do next, Austin residents have begun questioning whether there’s a better solution than simply rebuilding and expanding the highway.”

“As TxDOT considers what to do with I-35, it needs to stop thinking about the highway in a vacuum and instead should focus on how its investments can achieve multiple goals simultaneously. Austin’s citizens have made clear their desires for the future of transportation and it is not more highway building. On the 2020 ballot, Austinites voted overwhelmingly to fund Project Connect, a \$7.1b initiative to greatly expand the city’s public transit, and to invest \$460m in walking, bicycling, and safer streets. Project Connect is also notable in that its budget includes \$300 million in anti-displacement funds and so provides a template for keeping residents in place when infrastructure investments increase a neighborhood’s amenities, like a highway cap. With I-35, TxDOT should follow Project Connect’s lead and make sure its actions work in concert with Austin’s own plans for its future.”

The Congress for the New Urbanism is the leading institution on urbanism and progressive transportation & urban planning. This report highlights highways that hurt their cities, but that have the opportunity to make a number of widespread positive impacts should the corridor be creatively and progressively remade. Reconnect Austin agrees with the sentiments expressed in this report and urges TxDOT to consider the outstanding opportunity for positive benefits to the city and state if this project aligns with community values and City of Austin goals.

Reconnect Austin recognizes the opportunity for meaningful, transformative change in the I-35 Central corridor and calls on TxDOT to listen to community voices as well as input from City of Austin and Travis County. Reconnect Austin is disappointed by the current project alternatives in the amount of land that will be taken and people and businesses displaced, the lack of meaningful congestion relief and Transportation Demand Management strategies, the lack of

alignment with City of Austin and Cap Metro stated goals, the lack of alignment with stated community input and lack of transparency regarding said community input, the lack of well-designed facilities for pedestrians, bicycles, and transit, and the lack of comprehensive analysis of environmental impacts of each project alternative, including a full baseline analysis of I-35 as it is today. We appreciate that TxDOT has made improvements to this project since its beginning, and we call on TxDOT to continue to make improvements so that this project is implemented in its best possible version. Finally, we call on TxDOT to share project updates with community organizations who are involved in this project. Now that the Scoping phase of the EIS is over, TxDOT is not under federal mandate to provide information to the community every few months. We request that TxDOT take the initiative to be open about this project with the community that will be impacted by it. We specifically request that TxDOT meet with Reconnect Austin once every three months to share project updates during the next year, or longer, as they prepare the Draft Environmental Impact Statement.

Thank you for your dedication to the Capital Express Central project,

A handwritten signature in black ink, appearing to read 'Heyden Black Walker', with a long horizontal flourish extending to the right.

Heyden Black Walker
Chair, Board of Directors
Reconnect Austin