

**Austin Outside Letter on I-35**

2023-02

March 1, 2023

To: TxDOT I-35 Capital Express Central Project Team

From: Joanna Wolaver, Board President, Austin Outside

Re: I-35 Capital Express Central Feedback

The mission of Austin Outside is to champion vibrant and thriving outdoor places for all throughout Greater Austin. We're a coalition of nonprofits and businesses that believe in the power of our collective impact.

In this capacity, we offer the following feedback on the recently released Modified Build Alternative 3 (Preferred Alternative) as part of the I-35 Capital Express Central project:

- The main purpose of the proposed expansion is to support urban development of agricultural and natural lands surrounding Austin, which is contrary to the land conservation efforts of Austin Outside.
- Current build scenarios propose a significant increase in capacity, which will add toxic pollutants from the burning of gasoline and friction of tires in the center of Austin. This will exacerbate local air pollution resulting in more health problems and fatalities and will add to Greenhouse Gases (GHGs) instead of reducing our region's climate impact.
- Current build scenarios propose dumping unfiltered and untreated water from I-35 into the Colorado River, degrading water quality and adding pollution. Additionally, we have concerns that water outflow pipes across from Roy G. Guerrero Metropolitan Park could cause future damage to the park.
- Current build scenarios harm walking and bicycling mobility by adding more vehicles to our existing city streets without proposing additional safe walking and biking facilities. Furthermore, the DEIS does not analyze that traffic added to city streets compared to existing conditions, either within its stated Area of Influence (AOI) or in the actual area of influence which is actually much larger, e.g. 20-30 miles in radius.
- 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).

- Over the last 20 years, TxDOT has been projecting that I-35 will carry 300K vehicles, yet the Average Daily Traffic (ADT) remains at 200K. I-35 cannot carry 300K vehicles unless it is widened. The 300K projections in the DEIS are false, and the project should be reevaluated without them, e.g. with 200K projections instead.
- The proposed build scenarios do not do enough to manage demand for I-35. Better connectivity, including more frequent crossings and more ability to cap now and in the future, will increase the ability to deploy transportation demand management (TDM) strategies, including walking, biking, rolling, and transit use. Better connectivity and more TDM will help ensure that the City of Austin is able to meet our Austin Strategic Mobility Plan goals to shift modes of travel to active transportation and transit.
- The proposed build scenarios do not increase connectivity across I-35. New bridges will be enhanced, but the number of crossing points is not a net increase. The project should include full street crossings at:
  - 46th St. to Bentwood Rd.
  - 41st St. to Wilshire Blvd. (swapped with existing crossing)
  - Concordia Ave.
  - 9th St.
  - 5th St. (added)
  - 8th St. (preserve)
  - 2nd St.
  - Driskill St. to Willow St.
  - Holly St. (preserve)
  - East Ave. (preserve)
  - Woodland Ave. (preserve)
  - Reagan Terrace
  - Taylor Gaines St.
  - Mariposa Dr.
- There will be significant direct and cumulative impacts to parkland and natural areas, including, but not limited to, Palm Park, Waterloo Greenway, Lady Bird Lake, Town Lake Metropolitan Park, Waller Beach, Edward Rendon Sr. Park at Festival Beach, and the Butler Trail. The current project does not do enough to protect those natural resources.
- 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.

- 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.
- I-35 Cap Ex Central should be improved in the following ways:
  - 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.
  - TxDOT should incentivize traffic to use SH130, which was built as a bypass to I-35, but is currently not financially structured to encourage long distance drivers to go around central Austin.
  - Redesign any improvements to minimize induced demand, vehicle miles traveled, and the resulting pollution. This would include a robust study of induced demand, increased VMT, and a realistic assessment of both current and future pollution and that does not simply assume electric vehicles will solve these issues.
  - Redesign water management, including management of stormwater, runoff, and flooding, to ensure that water is filtered and treated before being returned to the Colorado River.
  - Document the impact of adding any highway lanes to local streets and the resulting impacts to walking and biking.
  - Design the “boulevard” to NACTO and COA standards so that it functions as a street, not a high-speed frontage road.
  - Reduce design speeds on all facilities, highway lanes, HOV lanes, by-pass lanes, frontage lanes, and boulevard to maximize safety for all road users. We are especially concerned about people using active forms of transportation.
  - Design ramping that is appropriate for urban areas and reduces the barrier of the highway. In most cities this is done with portal ramps. Consider removing ramping that is preventing additional connectivity.
  - Allow street trees in all locations at the surface: frontage roads (between moving traffic and shared use paths), bridges, caps, etc.
  - 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.
  - Mitigation strategies beyond capping in part of downtown and part of UT Austin should be offered. This should include strategies that align with Austin’s Climate Equity plans to reduce transportation emissions. By transportation emissions, we mean not only carbon monoxide, which TxDOT documents, but also other tailpipe emissions and particulate matter, which have not been studied in this DEIS and have a big impact on people using active transportation near I-35.
  - 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.

- While we appreciate TxDOT providing bicycle/pedestrian bridges over Lady Bird Lake, on either side of the vehicular bridges, we would ask that the designs be improved. Please strongly consider 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.
- 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, including the Town Lake Metropolitan Park, Waller Beach, Edward Rendon Sr. Park at Festival Beach and Palm Park, and any urban trails directly impacted, including the Butler Hike-and-Bike Trail and the Red Line Parkway, have improved access and usability with this project.

With the advocacy efforts of Austin Outside, our city has overwhelmingly passed bond measures that support the design and construction of a robust active transportation network. That network includes: all ages and abilities bike network, sidewalks, safe routes to schools, safe crossings, and urban trails. Generational improvements to our active transportation network are being planned and constructed right now. Any designs for I-35 should further enhance our growing active transportation networks.

While Austin Outside appreciates the work to date on the I-35 corridor, for the above reasons we cannot support either of the current build scenarios. Therefore, and at this time, Austin Outside supports the "No Build" alternative. We recognize that I-35 needs to be modernized. We would be supportive of a build scenario that addresses the issues listed above, as well as the issues highlighted in our letter from 9/22/2021(resubmitted onto the current record as an attachment).