



November 10, 2025

Tucker Ferguson, P.E.  
District Engineer, Austin District  
Texas Department of Transportation

Re: Improving the Safety, Comfort, and Character of I-35 Frontage Roads

Dear Mr. Ferguson,

With the I-35 Capital Express Central project underway through the heart of Austin, we are at a pivotal moment. Construction is visible today, and while the 2033 opening may feel far off, the frontage street decisions and utility layouts being finalized now will determine the safety, comfort, and character of this corridor for decades.

As architects, we're committed to the principle that good design helps communities thrive – socially, economically, and environmentally. For every project, this starts with considering the health, safety, and welfare for people of all ages and abilities – from everyday users to those just passing through – and across all modes of transportation.

Every day, more than 200,000 vehicle trips take place through Austin's stretch of I-35. TxDOT forecasts demand exceeding 300,000 by 2045 – just a decade after construction completion. The only sustainable way to meet that demand without inviting more congestion is to design frontage streets that safely and comfortably carry people who walk, bike, ride transit, *and* drive.

## **SAFETY**

We're encouraged by TxDOT's 2024 Roadway Design Manual (RDM), its emphasis on context-sensitive design, and its calls to serve "people of all ages and abilities, including people too young to drive, who cannot drive, and people who choose not to drive." In Austin's dense urban core, this latest guidance recommends design speeds of 30 to 35 mph for frontage streets and maximized separation between people and moving traffic. We urge the project team to apply this updated guidance throughout the central segments, rather than relying on earlier 2022 standards that did not provide the same level of context specificity.

The safety case for lower speeds is unequivocal. For a driver, the difference between 30 and 40 mph may feel minor, but for a pedestrian involved in a collision, the risk of severe injury increases by 50% and the risk of fatality doubles. The difference is not minor or abstract, it's critical.

Local data underscores the stakes. State roads account for 65 to 75% of Austin's traffic fatalities, making TxDOT's commitment to its Road to Zero framework uniquely consequential for Austin's Vision Zero progress. Where Austin has invested in protected facilities, intersection redesigns, and proven traffic calming, serious injuries and fatalities fall – yielding an estimated \$481 million in comprehensive crash cost savings for Austinites each year. The I-35 frontage streets can and should reflect the same evidence-based treatments.

## **COMFORT**

Shade and comfort are safety tools, too. Street trees and canopy narrow a driver's visual field and naturally encourage safer speeds while also protecting those walking, biking, and waiting for transit in our climate. Shaded surfaces can be 20 to 45° degrees cooler than their surroundings, and trees do this better than built shelters both



in measured temperature and perceived comfort. Without trees, fewer people will choose to walk or bike, transit ridership will be depressed, and our downtown ‘boulevard’ will remain just another frontage road.

## CHARACTER

This is not about adding complexity – it’s about choosing the safest, most cost-effective standards with the greatest impact. Austin’s Strategic Mobility Plan targets a 50/50 commute mode split by 2039, so our region can grow without proportionally adding vehicles. Frontage streets that welcome walking, cycling, and transit can be an essential congestion-reduction strategy, but success requires planning and coordination. If we get the frontage streets right, managed lanes and transit investments will move more people without more cars.

Our request is straightforward: build a frontage network that is safe, shaded, and multimodal on Day 1, and formalize the collaboration to achieve it. Specifically, AIA Austin asks TxDOT to:

1. **Affirm context-appropriate design speeds (30 to 35 mph)** for central-city frontage segments and align geometry to those targets – not just the posted signs – so that vulnerable users are protected by design rather than by enforcement alone.
2. **Maximize buffers and separation** between vehicle lanes and shared-use paths, creating continuous landscape buffers with utility-free zones that enable tree planting, and keeping pedestrian paths at a constant grade across driveways and intersections. These utility-free zones must be reserved now, before engineering is complete, or there will be no room for trees.
3. **Coordinate early and often** with the City of Austin, the University of Texas, neighborhoods, and local stakeholders to integrate Austin’s proven “Great Streets” and Vision Zero toolkits (e.g., refuge islands, removal of free-turn slip lanes, and pedestrian-first signal timing).

In closing, we invite TxDOT to partner with the community in applying context-sensitive design to the I-35 frontage roads already underway. The attached exhibits, developed with experienced urban designers and neighborhood stakeholders, show how modest back-of-curb adjustments can significantly improve the safety, comfort, and character of the corridor through central Austin.

Thank you for your leadership on this once-in-a-generation project. We would welcome a working session this month to align on design speeds, buffer standards, and utility placement that preserve space for shade trees and high-quality shared-use paths.

Sincerely,

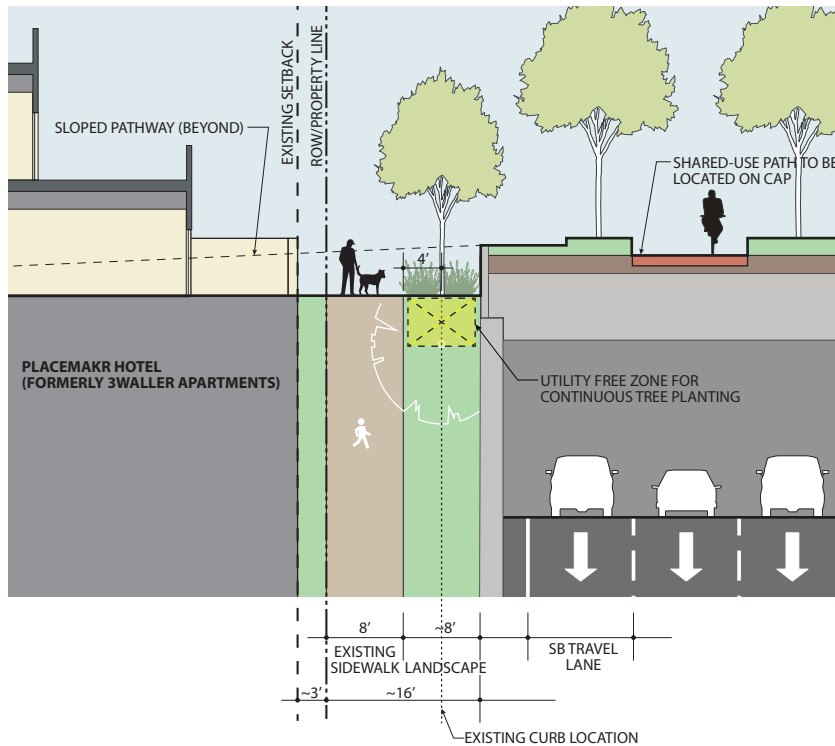
A handwritten signature in black ink, appearing to read 'R. B. Baldrige'.

Burton Baldrige, FAIA  
AIA Austin President, 2025

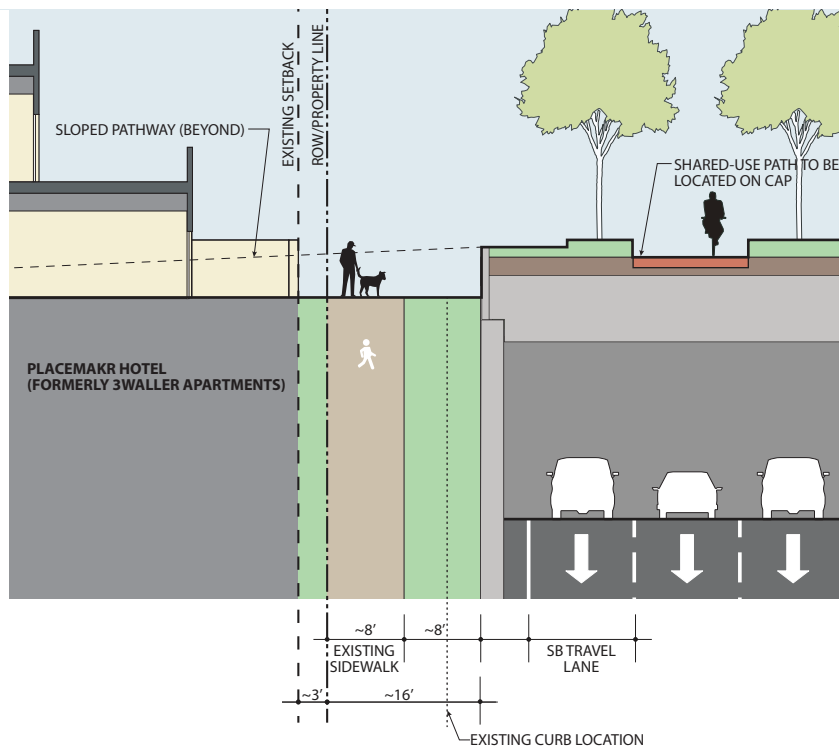
*CC: TxDOT: Tommy Abrego, Mobility35 Project Manager; Austin City Council: Mayor Kirk Watson; Mayor Pro Tem Vanessa Fuentes; Council Members Natasha Harper-Madison, Jose Velasquez, Chito Vela, Ryan Alter, Krista Laine, Mike Siegel, Paige Ellis, Zo Qadri, Marc Duchon; City Management: T. C. Broadnax, City Manager; Mike Rogers, Assistant City Manager; Transportation & Public Works: Richard Mendoza, Director; Eric Bollich; Michelle Marx; Brianna Frey; Cole Kitten; Travis County: Judge Andy Brown; Commissioners Jeff Travillion, Brigid Shea, Ann Howard, Margaret Gomez; Texas Legislature: Representatives John Bucy III, Donna Howard, Gina Hinojosa, Sheryl Cole, Vikki Goodwin, James Talarico, Lulu Flores; Senators Sarah Eckhardt, Judith Zaffirini*

### ***Recommendations from Prior Letter (September 24, 2025):***

1. Trees on Bridges – We appreciate the new TxDOT design standards that require 30' back-of-curb for shared use paths and planting zones on bridges. We understand from one of the studies that the City's engineering consultant provided, that inserting full-depth tree planters is entirely feasible, as these may be inserted between the structural girders of the bridge. It is important to achieve enough depth and volume of soil to sustain healthy shade trees. Living trees, and the shade they provide, will be critical for comfort and air quality on bridges. Please ensure that all bridges have trees, spaced 20 to 25' apart, to create a continuous shade canopy.
2. Create Space for Trees – By moving the Shared Use Path (SUP) to the edge of the right-of-way (ROW) line, as the City of Austin allows in the Central Business District, and placing a tree/landscape zone at the curbside, people walking and biking are then located in a much safer area of the right-of-way, i.e., further from the curb edge, and protected by the trees. The space required for the 2' maintenance zone shown in the TxDOT Design can then be allocated to the tree-planting zone at the curbside. Even in very constrained areas, this would yield a 12' wide SUP and an 8' wide open tree-planting zone. In less constrained areas there is room for a 14' SUP. Utilities may be located under the now wider SUP, so a continuous and utility-free trench for tree roots is maintained. Please ensure that all frontage roads, boulevards, medians, and the East Avenue Trail have trees, spaced from 20 to 25' apart to create a continuous shade canopy. Trees should also be planted in the median of all boulevards.
3. Managed Parking – Many large US cities efficiently use boulevards by allowing parking in the outside travel lane during off-peak hours. Providing such managed travel and parking lanes would provide adjacent parking for visitors on nights and weekends and improve access to activities on the future caps. The added parking would also increase safety for people who are using the caps and SUPs. As in many cities, the outside lanes are marked for the hours when parking is allowed. Tow trucks are typically used to clear out any vehicles that are parked illegally during hours marked as "no parking."
4. Remove "Free-Rights" between the Frontage Road and Boulevard on to City Streets – Free-rights (sometimes referred to as slip lanes) allow a higher-speed turn that is especially dangerous for people walking, biking, and rolling. The City of Austin has been actively removing these from our streets, while still allowing for curb radii appropriate for trucks and buses.
5. Safe Speeds – Several years ago, TxDOT agreed to design any frontage roads and boulevards in this segment to 35 mph. This public commitment was for design speed, not simply posted speed limits. We appreciate that commitment but also acknowledge that in a complex urban environment 30 mph would be safer for everyone, especially vulnerable road users. It is worth noting that the boulevards are very wide and will take a long time to cross on foot. Therefore, we recommend pedestrian refuge islands at each boulevard crossing so that a person walking can safely stop at the median and wait to cross the remainder of the street, as needed.
6. Lane Widths to Support Design Speed – We appreciate that most lane widths are 11' wide. However, the outside lanes, and sometimes inside lanes, are shown as 12'-6". We recommend that all lanes be 11' wide, and the extra 1'-6" be moved behind the curb. This treatment would have many positive impacts, including: reinforcing design speeds appropriate for the urban environment, increasing the width of SUPs and planting areas, and reducing crossing distances for people walking, biking, and rolling.
7. Clear Zones – Clear Zones are defined as: "The unobstructed, traversable area provided beyond the edge of the through traveled way for the recovery of errant vehicles". When Shared Use Paths (SUPs) are placed within clear zones it endangers the lives of vulnerable road users. Where clear zones may be required, we hope that your team will ensure that SUPs are outside of clear zones and trees are placed between the curb and those SUPs, providing both shade and added protection from moving vehicles.



## Improved Design Concept



## TxDOT Design

### I-35 CapEx Central Project

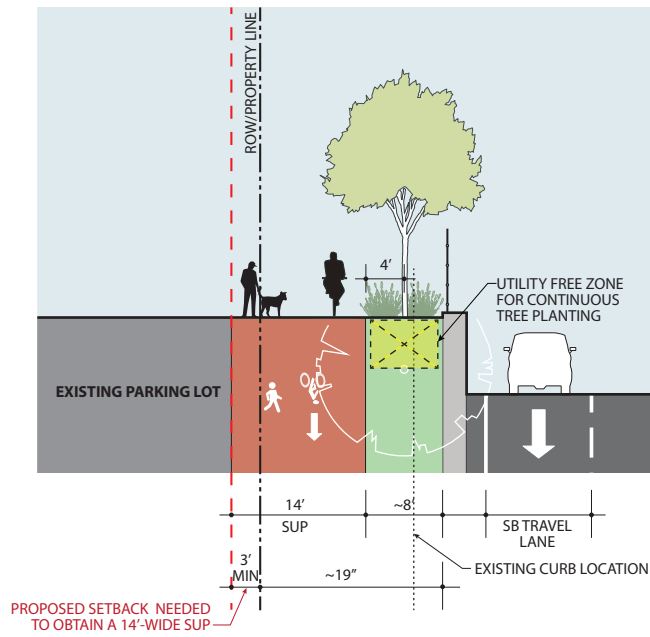
### Cross-Section of West Edge of ROW between E 3rd St & E 4th St, Looking North

DRAFT 8.18.2025

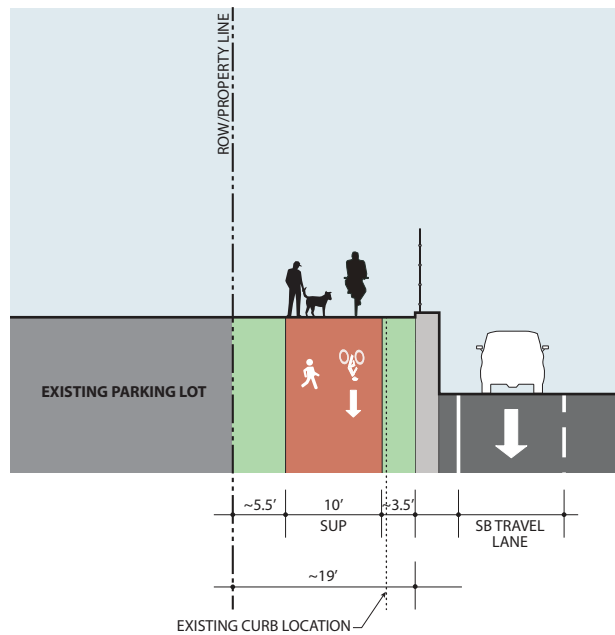


#### Notes:

- The TxDOT Design is a cross-sectional depiction of the plan view roll-plots of the 8.5.2025 Design, as posted on the [txdot.gov/mymobility35/projects/capex-central.html](https://www.txdot.gov/mymobility35/projects/capex-central.html) website. As no cross-sections or elevational information were provided, this cross-section is conceptual only.
- A minimum Utility Free Zone of 7' wide X 5' deep is required to allow for shade trees to be planted in a continuous trench, per the Concept Tree Planting Detail found at the end of this package. It is critical to ensure that no underground utilities are located within this zone.
- Trees planted in a continuous trench each require a minimum soil volume of 750 cu ft. Individually-planted trees require a min. soil volume of 1,000 cu ft.



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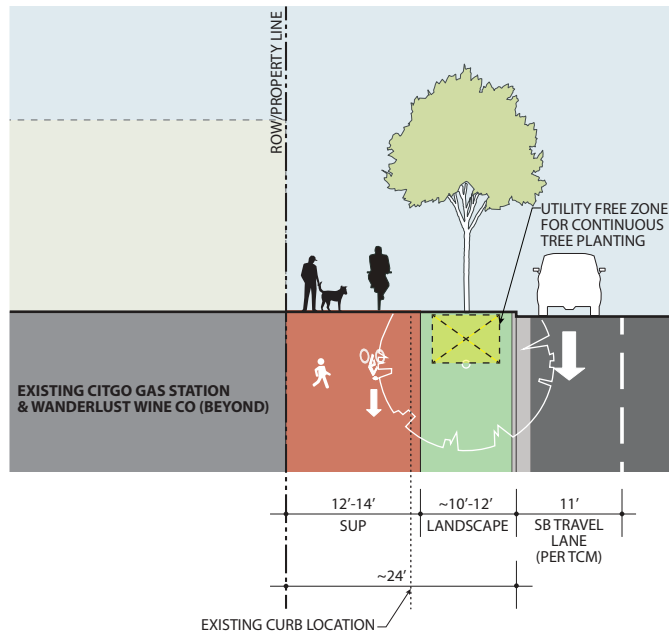
### Cross-Section of West Edge of ROW between E 4th St & E 5th St, Looking North

DRAFT 8.18.2025

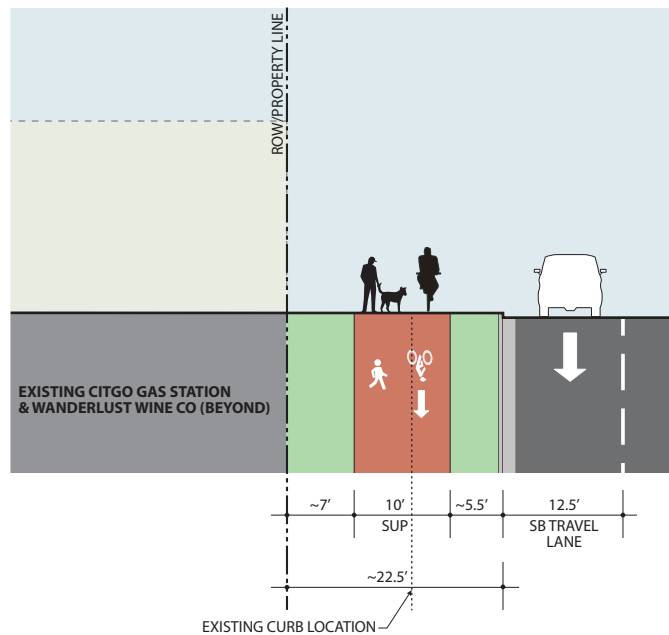


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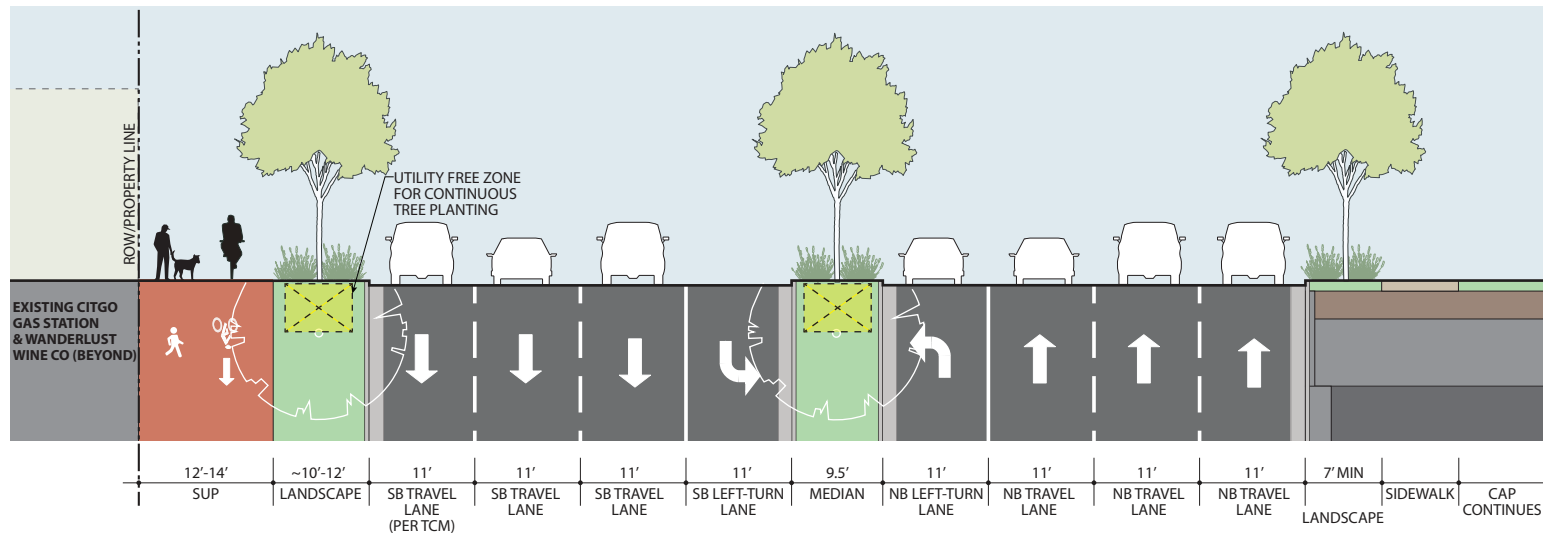
### Cross-Section of West Edge of ROW between E 6th St & E 7th St, Looking North

DRAFT 8.18.2025

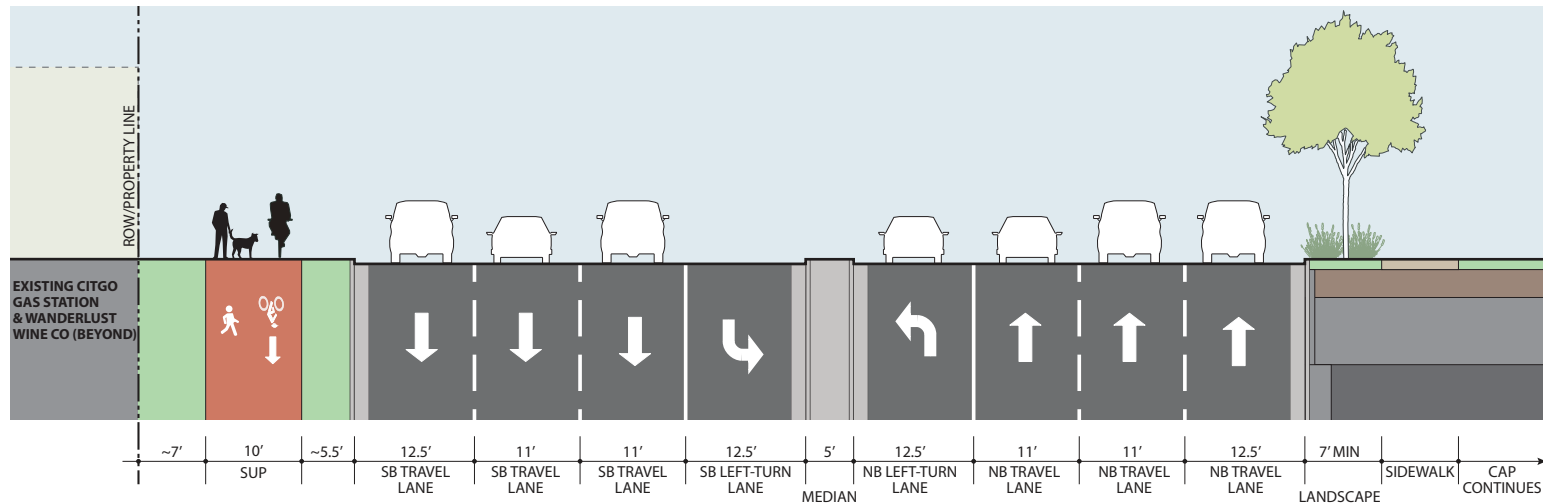


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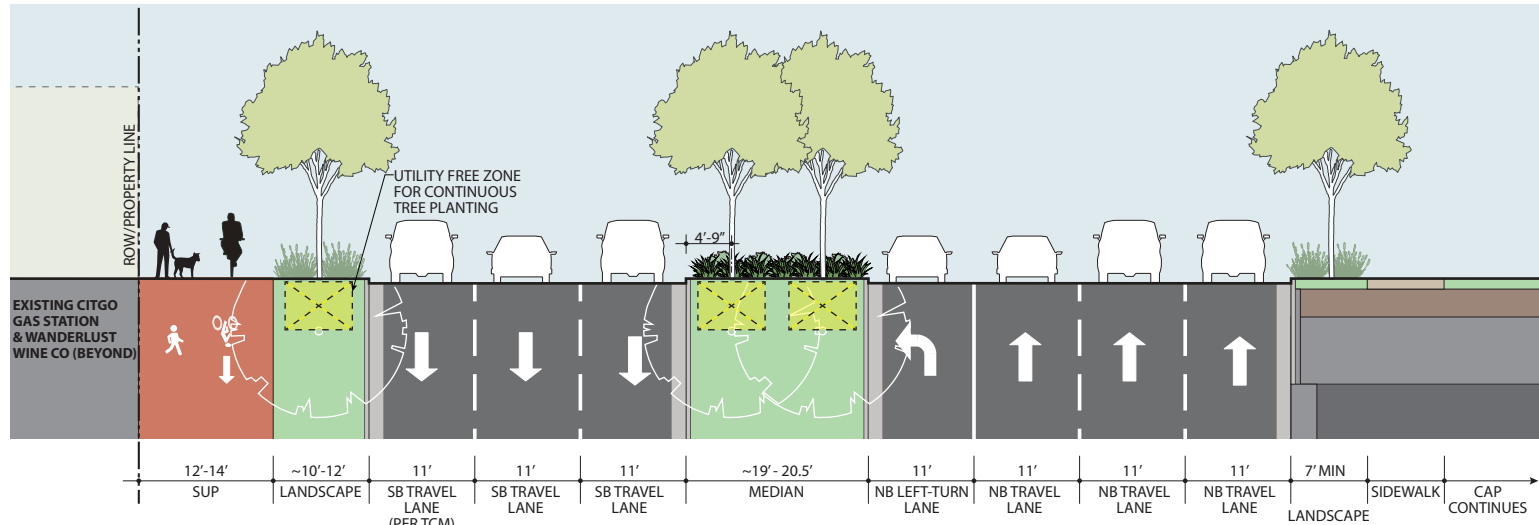
### Cross-Section of Frontage Road between E 6th St & E 7th St at Mid-Block, Looking North

DRAFT 8.18.2025

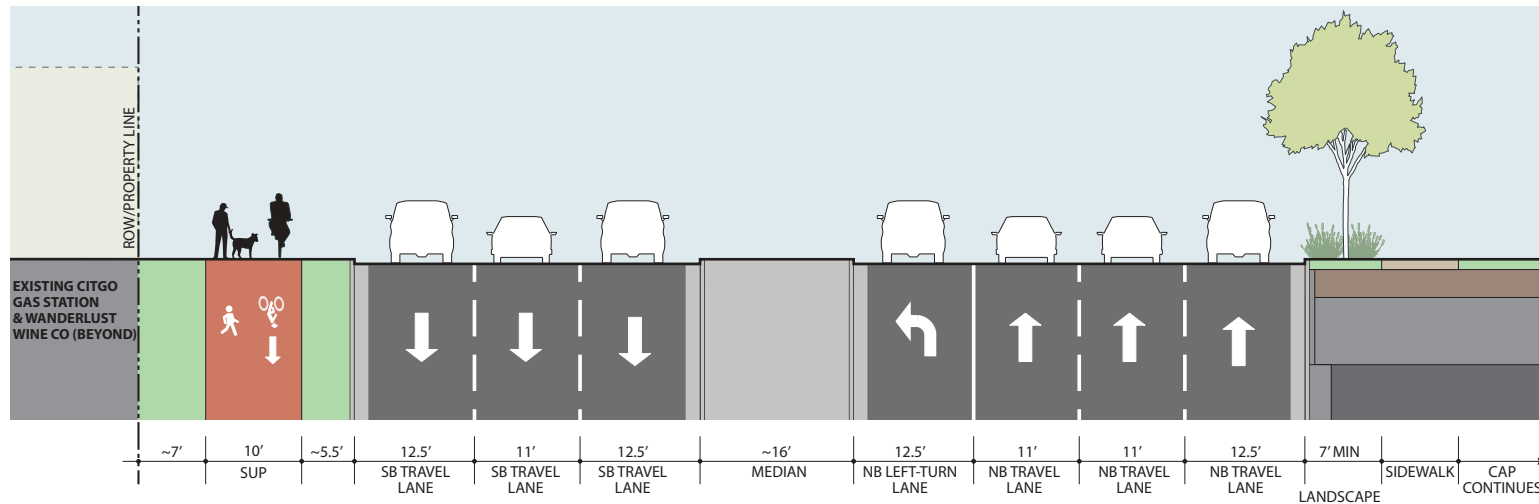
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### Improved Design Concept



### TxDOT Design

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### Cross-Section of Frontage Road between E 6th St & E 7th St at Intersection, Looking North

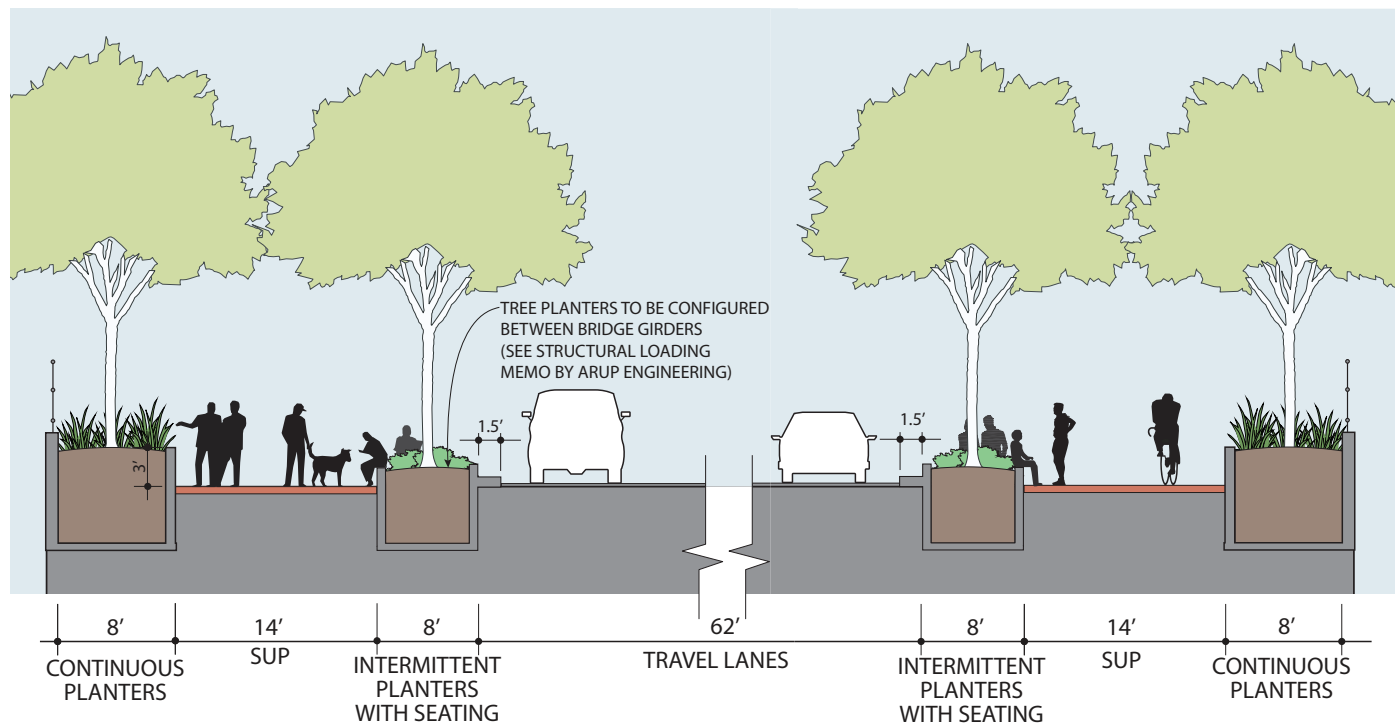
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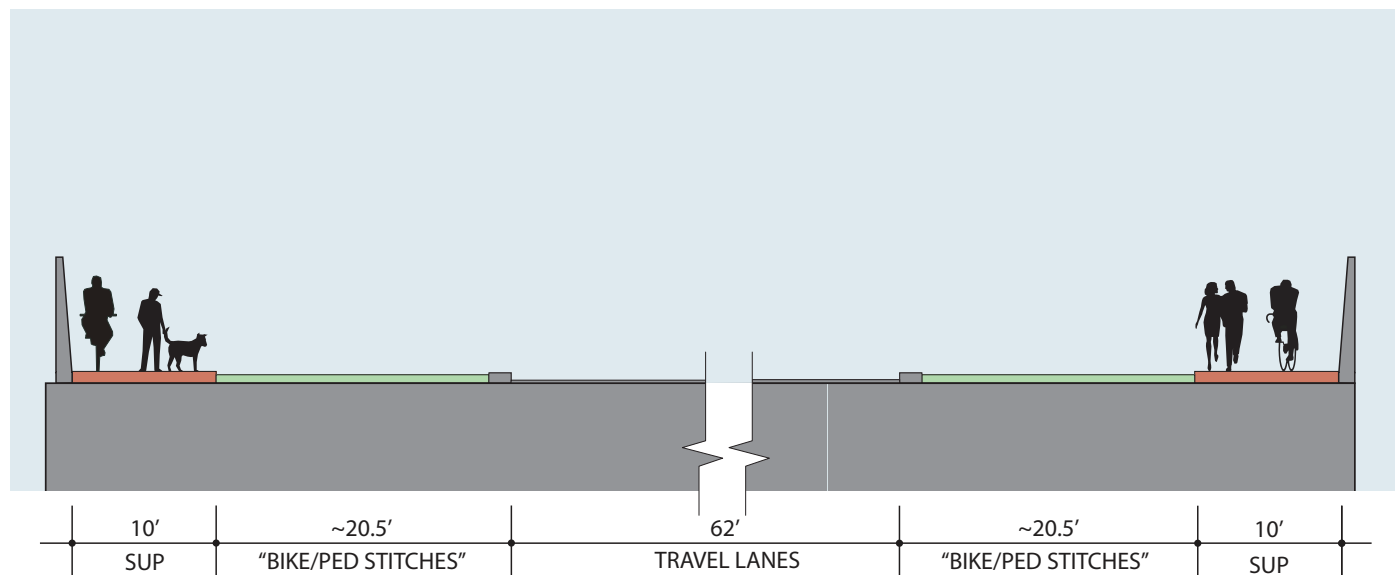
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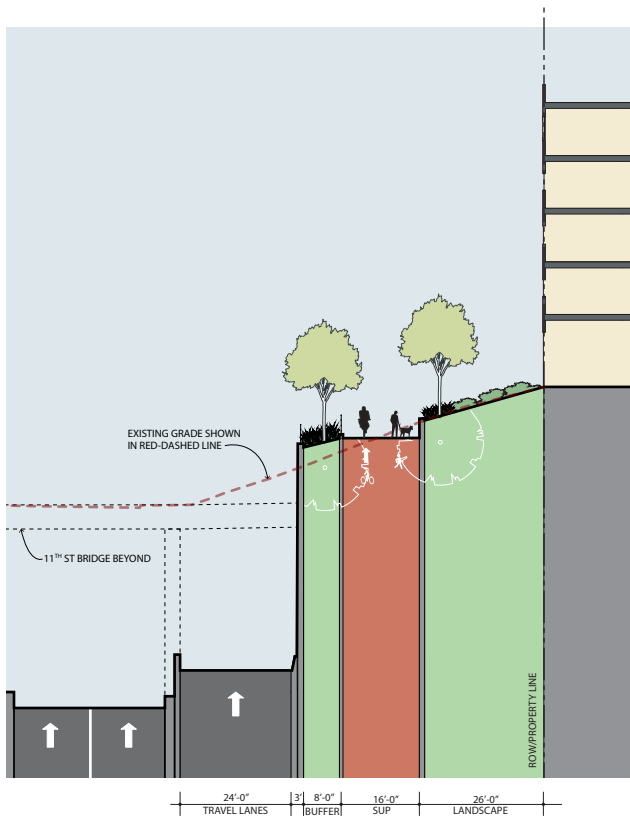
#### Cross-Section through E Cesar Chavez St Bridge, Looking West

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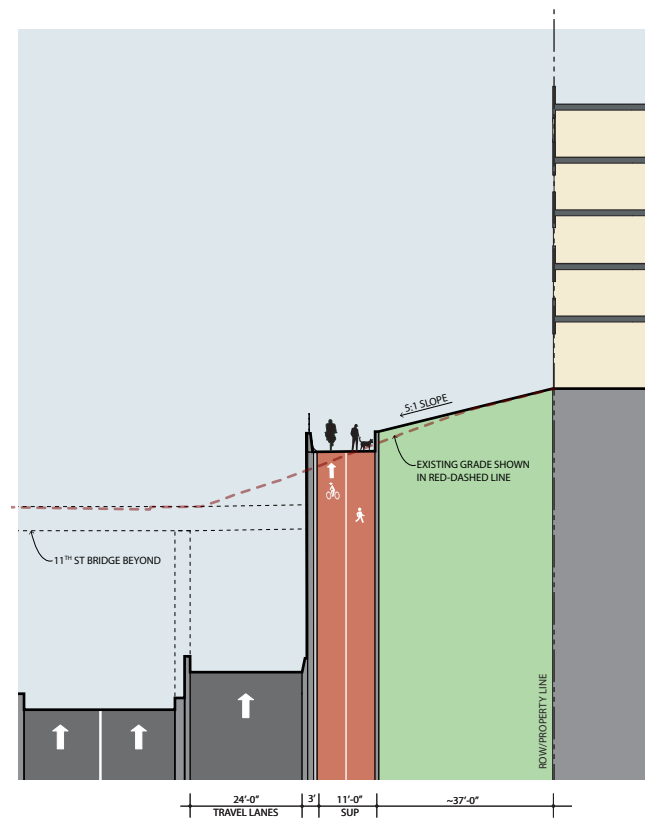
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**Improved Design Concept**



**TxDOT Design**

## I-35 CapEx Central Project

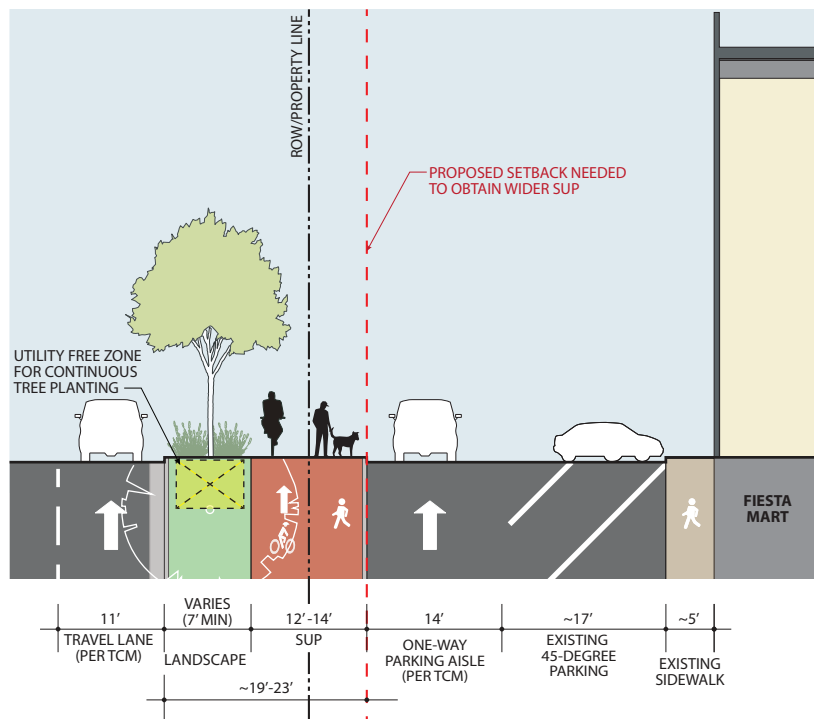
### Cross-Section of East Avenue Trail at E 10 St, Looking North

DRAFT 8.18.2025

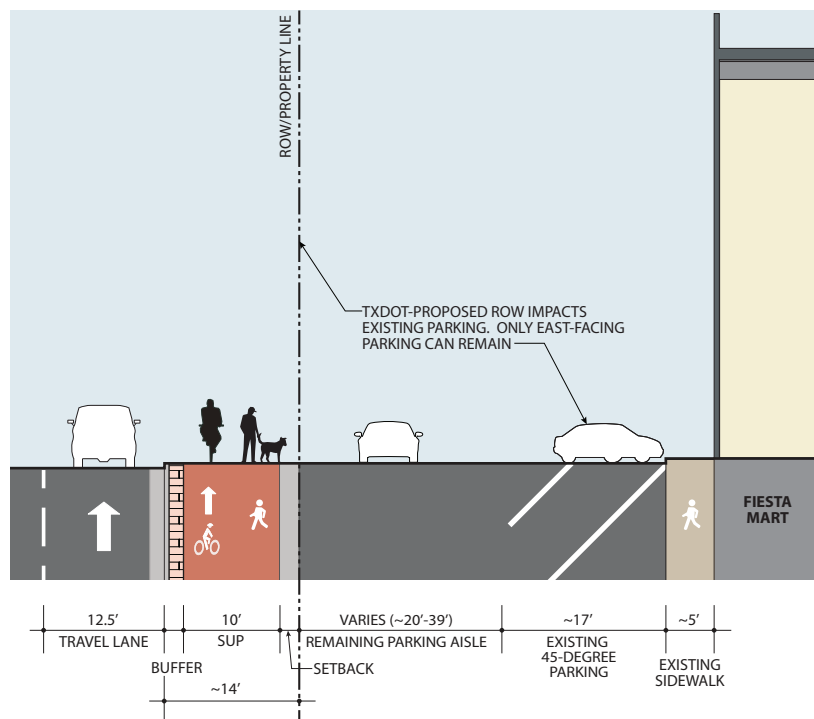
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### Improved Design Concept



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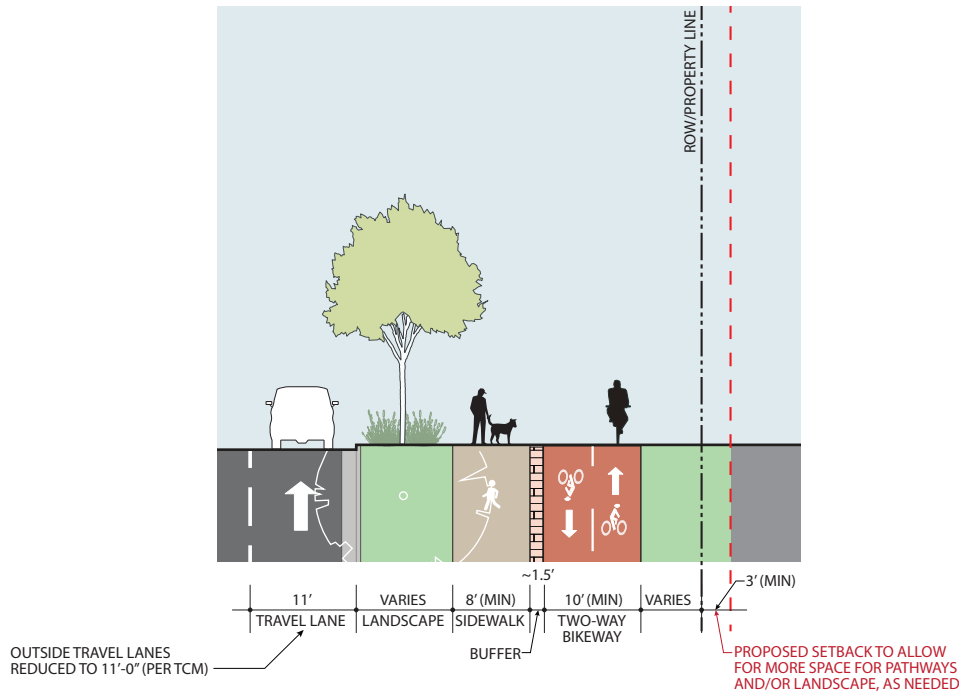
### Cross-Section of East Avenue Trail at Fiesta Mart / E 40th St, Looking North

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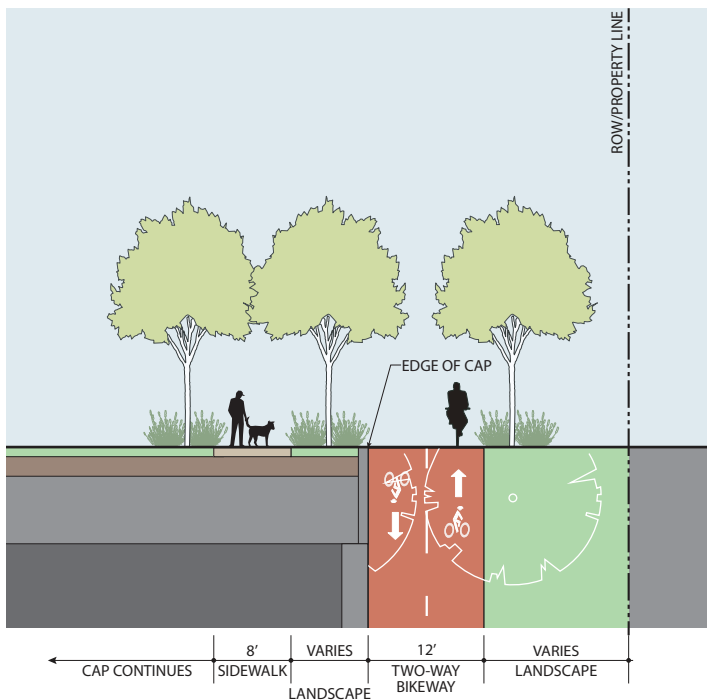
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### Constrained Condition, Looking North (Example: Between E 13th St & E 14th St)



### Unconstrained Condition, Looking North (Example: Between E 5th St and E 6th St at Cap)

#### I-35 CapEx Central Project

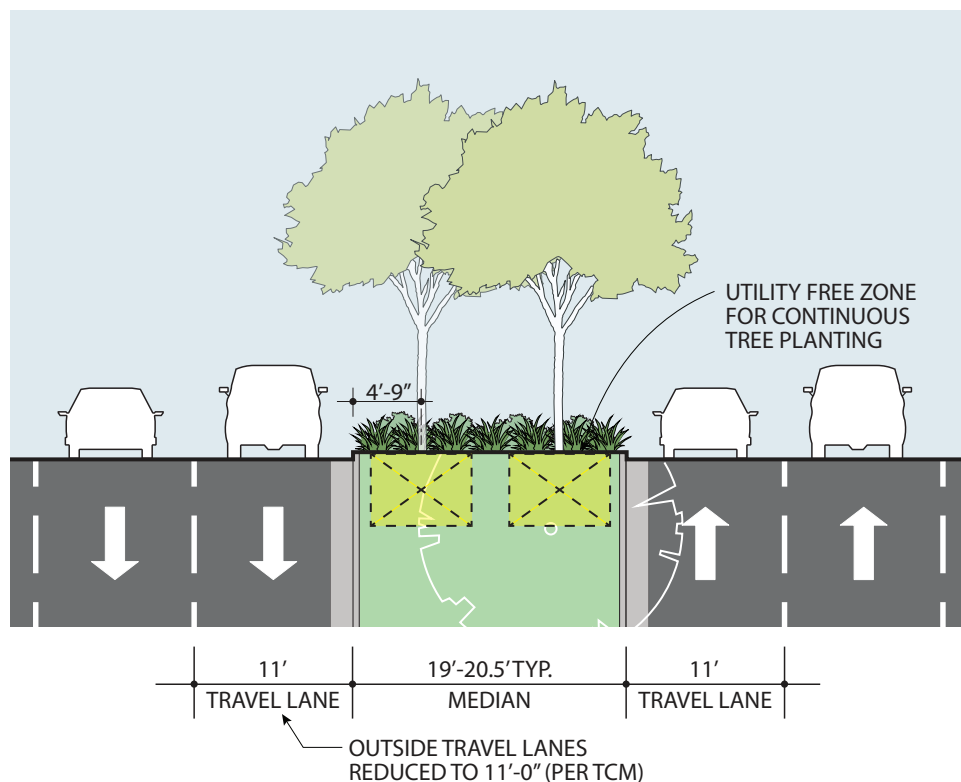
#### Cross-Sections of East Avenue Trail Concept

DRAFT 8.18.2025

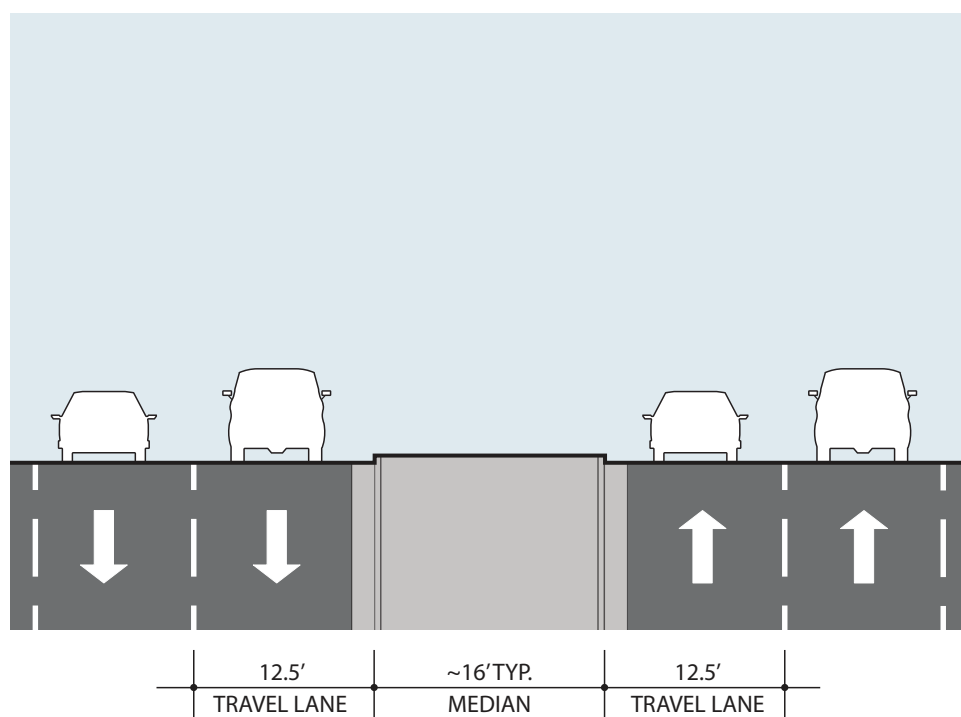
#### Notes:

- East Avenue Trail cross-sections are based on the Our Future 35 Vision Plan, dated November 2024.
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### Improved Design Concept



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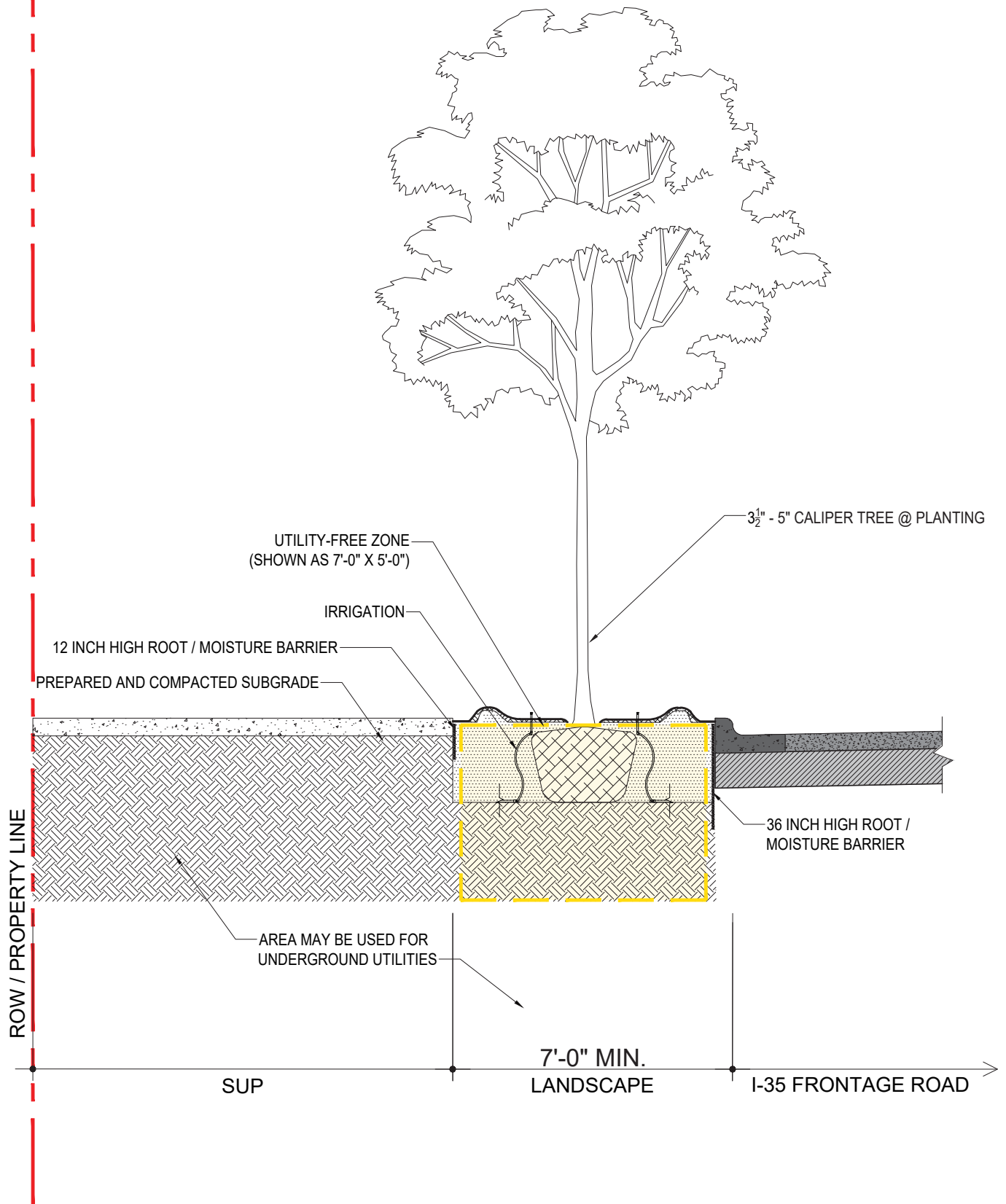
#### Cross-Section through Median at Frontage Road, Looking North

DRAFT 8.18.2025



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### Concept Tree Planting Detail in Open Planting Trench, Looking North

I-35 CapEx Project  
Draft 08.18.2025