



April 20, 2020

Capital Area Metropolitan Planning Organization  
Transportation Policy Board Members  
3300 N. Interstate 35, Suite 630  
Austin, Texas 78705

Via Email

**Re: Comments on the CAMPO Draft 2045 Regional Transportation Plan**

Dear Members of the CAMPO Transportation Policy Board:

Save Our Springs Alliance (SOS Alliance) offers the following comments on the CAMPO Draft 2045 Regional Transportation Plan (RTP). SOS Alliance appreciates the opportunity to offer our input and your consideration thereof. SOS Alliance offers general comments on the plan followed by discussion of specific projects that should be removed from the plan.

**1. The Public Participation Process Did Not Provide the Public a Reasonable Opportunity to Comment on the Plan.**

SOS Alliance, along with other organizations and residents, submitted a letter dated March 9, 2020 to CAMPO's Transportation Policy Board, discussing in detail several issues with the public participation and planning process, including concerns about access to information and technical issues with the map associated with the Draft Plan. Rather than repeat those here, we incorporate by reference this letter, attached hereto. Below, we summarize public comment issues that have arisen since the March 9th letter.

The comment period on the 2045 Regional Transportation Plan began on February 24, 2020, when CAMPO published a "Partial Draft Plan" on its online open house website. As of April 15th, this was still the version available on the website. The Partial Draft Plan is lacking in analysis and information on several key issues, including environmental justice, environmental mitigation, and financial plan components. The Partial Draft Plan contains many placeholders and relies on supporting documents that have not been made available to the public.

The Partial Draft Plan is also missing the traffic modelling, which would show how the CAMPO staff have evaluated how the plan, and its various parts, will affect travel delay, congestion, and vehicle miles travelled. This modelling analysis is a critical part of the plan; yet, the public and the CAMPO board have had no opportunity to ask questions about it or to make relevant comments.

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It came to our attention indirectly that the Partial Draft Plan was updated on March 26th, but there is nothing on the website or otherwise notifying the public of this update. The updated draft plan was accessible only by clicking on a hyperlink buried on page 175 of the Meeting Packet for the April 6, 2020, Transportation Policy Board Meeting. This link has since expired. CAMPO should extend the public comment period to no sooner than 60 days following the completion and public release of the draft plan.

Although the demographic forecasting data was made available to the public on March 8th, it was made available so late in the process that it failed to give “adequate . . . time for public review and comment at key decision points.” *See* 23 C.F.R. § 450.316(a)(1).

In addition, the Project Map on the Draft Plan website changed since its original publication, with several of the more controversial new road projects no longer visible. A member of the public reported seeing this change on April 8th. Upon inquiry, CAMPO staff clarified that the projects are still in the Draft Plan. Staff provide no further clarification, and as of April 15th, the erroneous map remains on the website. In addition, this version of the map still does not reflect the changes from the updated project list dated March 2nd.

## **2. CAMPO Should Prioritize Projects that Enhance Choice and Reduce Demand Over Building More Roads.**

While proposing to spend over \$40 billion over the next 25 years, the draft CAMPO plan predicts traffic will only get worse. That’s because the bulk of the spending is aimed at building new and expanding existing roads that assume and encourage people to drive ever-longer commutes to their places of employment. This is backwards. We should be planning for (and assuming) that people will drive less, on a per capita basis, in the future. We will live closer to where we work—not farther away. We will telecommute more. We want to protect our air, land, and water—not consume more land, pave it over, and pollute our air and water with even more single-occupancy vehicles and longer distance commuting.

CAMPO should prioritize transit investment to reduce vehicle miles traveled (VMT), which will also reduce our region’s greenhouse gas emissions and other harmful air pollutants.

As Travis County Judge Eckhardt explained in CAMPO’s most recent meeting, we are living in a period of “golden opportunity” to realize the benefits of solutions based on traffic demand management, such as telecommuting. With as much pain as we’ve experienced with the current COVID-19 crisis, we should at least reap the benefits of what it is teaching us. Getting commuters off the road relieves congestion, cleans our air, and makes our region healthier. This does not mean we must continue the extreme policies that we are experiencing now, but we can, at a minimum, use incentives and regulatory mechanisms to encourage employers to continue versions of these telecommuting policies so that we do not reach the demands we’ve experienced in prior years. Greatly increased rates of telecommuting, made possible by changed policies of public and private employers, combined with other changes in employer and commuter behaviours—such as more staggered work hours, more car- and van-pooling, reduced distances between employment centers and affordable housing, and

evolving transportation management systems—can all greatly reduce rush hour congestion, thereby erasing the primary “demand” for expanding roads and building new ones.

### 3. The Draft Plan is Travel Demand Modelling Information.

The Draft RTP does not include any information on the Travel Demand Modelling. Modelling is the critical evaluation of the plan and the decisions made therein. It should have been included at the outset, along with all key inputs and assumptions, so that it could be evaluated by stakeholders and the interested public. Yet the first time any modelling results were made public was the March 23, 2020 TAC meeting. The modelling showed traffic only getting worse even if all \$42.5 billion worth of projects were built:

#### Draft Preliminary Model Results

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2045 Constrained  
Candidates

Metrics	2015 (Baseline)	2045 (No-Build)	2045 (Build)
Population	1,933,238	4,671,000	
Lane Miles	12,987	13,608	16,306
VMТ (per capita)	25.97	24.07	25.52
VHT (per capita)	0.58	1.13	0.86
Congestion (V/C)	0.25	0.54	0.47
Speeds	45	21	29.6

Draft Preliminary Only Results- Subject to Change

Source: Mar. 23, 2020 TAC Meeting, Presentation

### 4. CAMPO Should Fully Disclose and Redo the Demographic Analysis for the Six-County Region, Especially for Hays County and Southwestern Travis County

SOS Alliance requests for CAMPO 2045 demographics data were denied for several months, in violation of the Texas Public Information Act. When SOS Alliance finally obtained the requested information—when it was published on a public website without informing us that it was available—SOS lacked sufficient time to do a full analysis of the population and employment projections, especially of the projected geographic distribution of populations.

However, we were able to analyze the CAMPO 2045 baseline and projected distribution of population for western Hays County. This analysis was prepared for us by Norm Marshall of SmartMobility. Mr. Marshall served as the primary transportation consultant for Envision Central Texas in its work on the CAMPO 2030 and 2035 plans, and he consulted with SOS on the CAMPO 2040 plan. Mr. Marshall’s extensive experience, both nationally and with 20 years of CAMPO planning, makes him uniquely qualified to review

Mr. Marshall’s analysis, shown in the line graphs and tables (attached hereto, and incorporated herein by reference) to these comments shows that the CAMPO 2045 plan overestimates to a rather extreme degree the likely population growth in western Hays

county, over and upstream of the Edwards Aquifer, while underestimating growth in eastern Hays County, along and to the east of I-35.

Overwhelmingly, new residents in Hays County have been moving to the Buda/Kyle/San Marcos corridor along and east of I-35. The rate of population growth in western Hays County, within the Edwards Aquifer watershed, has been much slower. Yet, the CAMPO projections flip this growth trend, projecting explosive growth in western Hays County and slowed growth in the I-35 corridor.

There is simply no rational basis for these projections. Environmental, economic, access, and social factors will continue to direct the bulk of Hays county growth to the I-35 corridor and to the east of I-35, toward the SH 130 corridor. As more lands are taken out of the development pool through purchase for watershed protection, parks, and private ranches, future constraints on development in western Hays County, including the limitation of available water supplies, are only likely to get more severe and more restrictive.

Besides making projections that have no rational basis, the CAMPO 2045 draft plan authors misrepresent these population projections as based on “trends..” They do not reflect trends; they have nothing to do with actual trends. in growth over the last 20 years.

The attached analysis shows actual Hays County population growth trends in two areas within the county: those areas within the Edwards Aquifer watershed and that area to the east and downstream of the Edwards Aquifer. This is from CAMPO 2003 data (for calendar year 1997) and CAMPO 2045 data for the baseline year of 2015.

The analysis then compares these actual growth trends to those included within the CAMPO 2045 demographic forecasting files for the year 2045. The CAMPO staff projects that the population within the Edwards Aquifer watershed in western Hays County will increase 450% in the 30-years from 2015 to 2045, growing from 79,000 to 433,000.

But CAMPO’s own data shows that the actual growth trend in western Hays County would lead to a total of only 54% growth for the 30-year 2015 to 2045 period, growing to only 122,000.

By contrast, the CAMPO 2045 staff draft predicts Hays county population in the I-35 corridor downstream of the aquifer growing from about 104,000 in 2015 to 230,000 in 2045, for a total of about 125% growth. This is only slightly higher than the actual growth trend in this eastern part of Hays County.

Presumably, it is the grossly overestimated growth in population projected for western Hays County that provides the basis for a \$4.2 billion network of new and expanded roads in the Edwards Aquifer watershed in southwest Travis and western Hays County. Attached to this letter (and incorporated herein by reference) is a map of this network of new and expanded roads in the draft 2045 plan, along with a chart of those projects that shows their estimated cost and a brief description of each project that is included in the draft plan project list.

It is not known whether other areas of the CAMPO six-county region are projected to increase in population at rates either vastly above or vastly below actual growth trends and, if so, what the basis, rational or otherwise, is for any such variances from actual trends. To the

extent variances exist, they should do so in promoting growth management, environmental protection, and other goals of the CAMPO member jurisdictions. For the Hays County projections, the result is the opposite—conflicting directly with longstanding plans adopted by communities like San Marcos and Austin to limit development within the Edwards Aquifer watershed and to protect land for water quality and open space purposes.

The CAMPO 2045 population and employment projections, including their distribution, should be subject to professional peer review and scrutiny by the general public and by the CAMPO member jurisdictions. To our knowledge, none of that has occurred. The demographic projections should meet professional standards and practices for making such projections. Without reasonable and reliable projections of population and employment distribution, it is impossible to run reliable traffic modelling and, in turn, evaluate the need for a given proposed project and how it compares to other options and priorities.

## **5. CAMPO Should Incorporate Climate Change Metrics in Criteria and Analysis.**

The draft RTP does not include any discussion of climate change. In 2018, transportation accounted for approximately 38% of greenhouse gas (GHG) emissions in our region (Travis County Climate Action Plan, 2020.) Transportation-related emissions have increased per capita over the last decade, in part due to a focus on roadway infrastructure encouraging single-occupancy vehicle use and associated lack of investment in alternative transportation modes.

The existential threat of global heating calls for prioritizing traffic demand management (TDM) strategies, rather than simply throwing them in as a minor component or afterthought. The current pandemic illuminates the potential for telecommuting. The harm from paving the planet is extreme. Not only does increasing vehicle emissions exacerbate climate change but so does the increased pavement on the ground. Concrete is the third most climate-harming substance, trailing only oil and coal.<sup>1</sup>

CAMPO should analyze how the RTP will affect GHG emissions, include GHG emissions in the scoring rubric for projects, and incorporate a climate-change performance measure to compare alternative projects and scenarios for long-range transportation planning.

Existing resources can provide guidance and implementation methods for CAMPO to evaluate climate change in their planning. The U.S. Department of Transportation has collected information on how other MPOs have approached climate change issues.<sup>2</sup> California MPOs have been particularly advanced in incorporating climate change into their long-range planning processes. In addition, the U.S. Environmental Protection Agency provides a GHG calculator to assist in estimating emissions levels based on a variety of inputs, including numbers of passenger cars.<sup>3</sup> Without this level of analysis, climate change will continue to be a footnote of the transportation plan, with no meaningful assessment of its impact.

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<sup>1</sup> See <https://www.theguardian.com/cities/2019/feb/25/concrete-is-tipping-us-into-climate-catastrophe-its-payback-time-cement-tax>; and <https://www.theguardian.com/cities/2019/feb/25/concrete-the-most-destructive-material-on-earth>.

<sup>2</sup> <https://www.transportation.gov/sustainability/climate/case-studies-mpo-activities>

<sup>3</sup> <https://www.epa.gov/energy/greenhouse-gas-equivalencies-calculator>

## **6. Draft Plan Lacks Environmental Mitigation Strategies and Activities.**

The Draft Plans (both versions) fail to include the federally required discussion on environmental mitigation strategies and activities. An RTP planning process must, among other things, “provide for consideration of projects and strategies that will . . . protect and enhance the environment, promote energy conservation, . . . and reduce or mitigate stormwater impacts of surface transportation.” 23 U.S.C. § 324(h)(1). More specifically, an RTP “shall include a discussion of types of potential environmental mitigation activities and potential areas to carry out these activities, including activities that may have the greatest potential to restore and maintain the environmental functions affected by the plan.” 23 U.S.C. § 324(i)(2)(D); 23 C.F.R. § 450.324(f)(10). Environmental mitigation activities are defined as “strategies, policies, programs, and actions that, over time, will serve to avoid, minimize, rectify, reduce or eliminate impacts to environmental resources associated with the implementation of [an RTP].” 23 C.F.R. § 450.104. This discussion may focus on policies, programs, or strategies, rather than at the project level. 23 C.F.R. § 450.324(f)(10).

The “Environmental Considerations” discussion in the RTP is one paragraph. It asserts that “analysis of land and water impact are included in the regional special studies found in the appendices.” Updated Draft Plan at 18. This is not true. Despite the well-established science on the effects of highway construction on water quality and flooding, nowhere in the Draft Plan or Appendices are the environmental impacts of road projects considered. The only Appendix that concerns roads is the “Regional Arterials Concept Inventory,” which was downgraded to a suite of ideas for project sponsors such that even if it had such a discussion, it would not be relevant. As it turns out, the Concept Inventory merely contains the same bland, unsupported language as the draft plan, that “CAMPO works to protect air quality, habitat, cultural resources, forests, and waterways for Capital Area residents.” Updated Draft at 18.

Furthermore, the MPO must develop the discussion “in consultation with Federal, State, and tribal wildlife, land management, and regulatory agencies.” 23 U.S.C. § 324(i)(2)(D); 23 C.F.R. § 450.324(f)(10).<sup>4</sup> There is nothing in the Draft or Appendices about any consultation occurring whatsoever.

## **7. The Draft RTP Lacks Fiscal Constraint and Does Not Reflect the Planning and Prioritization Process Contemplated in Federal Law.**

The draft RTP is not meaningfully fiscally constrained. The Plan projects having \$42 billion to spend on projects in the next 25 years, over half of which would come from local sources such as municipal bonds. CAMPO staff stated at a TAC meeting that the source of local funding was derived from reviewing local entities’ past transportation-related bonds. However, the draft Fiscal Analysis—a required component of an RTP—has still not been made public.

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<sup>4</sup> Consultation is a structured process defined by regulation to mean that “one or more parties confer with other identified parties in accordance with an established process and, prior to taking action(s), considers the views of the other parties and periodically informs them about action(s) taken.” 23 C.F.R. § 450.104.

Out of 557 projects submitted for consideration in the 2045 Plan, 539 projects scored “above the cut line” and are included in the plan. However, the vast majority (455) of road projects were not scored because they were categorized as “100% locally funded.” This approach is apparently intended to allow as many projects as possible to be put in the project list. This is the opposite of planning.

This dodge of the critical requirement that the plan be fiscally constrained is made worse by a consistent pattern of underestimating the costs of the projects listed. One need only look at recent CTRMA projects, as just one example, of actual project costs faced at the time of construction and right-of-way acquisition being in a whole different ball park from the estimated costs set out in earlier project estimates. As with the demographics projections, project cost estimates should be subject to standards set by peer review or published industry cost estimating standards, so that cost estimates are both realistic and consistent from one jurisdiction and project sponsor to the next.

The current debate before the TPB regarding which projects to maintain or defer funding for in order to bridge the I-35 funding gap illustrates the need to have project scores and reliable cost estimates readily available. To the extent that the funding sources for these projects will be amended later to include federal funding, these projects should be scored at the outset. Scoring allows the relative merit of projects to be compared with some degree of consistency and reliability, enhanced with public scrutiny and comment.

### **8. New Roads and Expansions that Increase Capacity Over the Edwards Aquifer Watershed Should be Removed from the RTP.**

The Edwards Aquifer is the primary drinking water source for much of the population of Hays County, including the cities of Kyle, Buda, and San Marcos. It’s an aquifer composed of mostly porous limestone, with limited filtration capability, making it extremely vulnerable to pollution that results from roadway construction, urban development, and stormwater runoff.

The Draft RTP proposes spending over \$4.2 billion to expand and build highways over and upstream of the Edwards Aquifer in western Hays County and southwest Travis County. Rather than expand highway capacity in this region, we should spend a fraction of the proposed \$4.2 billion to buy more watershed protection lands, and spend another fraction making roads in the Edwards Aquifer watershed safer and more scenic.

### **SOS Alliance opposes and requests the removal of the following road projects:**

**Escarpment Blvd extension into Hays County (Rutherford Ranch Bypass or NF 13) –** Creates a brand new 10-mile road right through the heart of the Texas Hill Country/Recharge Zone, crossing Bear Creek, Little Bear Creek, and Onion Creek. This extension of Escarpment Blvd is unnecessary and would cut a new path of asphalt through the middle of the recharge zone and City of Austin Water Quality Protection Lands.

**San Marcos Parkway Loop (western loop)** – Another top priority to oppose, this project creates a new 10 mile, 4-lane road which crosses the Blanco River and falls almost entirely within the Edwards Aquifer recharge zone. With an eastern loop expansion already planned around San Marcos, coupled with I-35 and tollway 130 widening further east, this western parkway is unnecessary. A segment of that new road is planned for near-term 2020-2025, right over the recharge zone, extending south from the RR 12/Wonder World Dr. intersection for several miles, over the recharge zone. It looks like they are planning this San Marcos loop in phases, first this south segment (let year 2025), then the rest of the southern part of the loop, then the northern part of the loop. It seems that once this first segment gets going, it would be more difficult to stop the rest of the loop.

Most of the route of this western loop around San Marcos passes through undeveloped land consisting of small and large ranches. It would include a new bridge over the Blanco River. The primary purpose of the loop would be to support new development. It's actual traffic benefits for current residents and commuters are extremely limited. By adding pavement and spurring a broad swath of new development upstream of San Marcos, in the Sink Creek and Purgatory Creek watersheds, the loop would increase pollution runoff directly into the aquifer a short distance from San Marcos Springs and the San Marcos River. The loop and the growth it would spawn would also increase flooding downstream, in the already highly flood prone central and eastern San Marcos.

**River Ridge Pkwy** – north of San Marcos, another “shortcut” road is planned east of I-35, a 1-mile connector that would shorten the drive from I-35 to Lime Kiln Rd by maybe a mile. This new road, part of a larger \$74M project, would cross into the eastern recharge zone, with another bridge over the Blanco River. This new road is also unneeded when the actual demographic trends of western Hays County are considered. There would be more harm than good from this new road.

**Lime Kiln Rd/Blanco River Bridge** – southwest of Kyle, CAMPO proposes building a bridge over the Blanco River in the eastern recharge zone, along with a new ½ mile connector road, so that drivers don't have to use the low-water crossing over the Blanco River in this area. Again, it's questionable whether this \$10M project even needs to be undertaken in a relatively rural area of the Texas Hill Country. The Blanco River is typically dry in this area due to recharge features, so the low-water crossing is usually passable, and when it isn't there are nearby alternate routes available now.

**Kyle Loop (NF 17)** – northwest of Kyle, CAMPO proposes a 3-mile “shortcut” road connecting FM1626 with FM 150, which would save drivers just a half mile of driving vs. current roads. The road would cut through the eastern edge of the recharge zone, at a cost of over \$10M.

**FM 150 extension west of RR 12** -- proposed to cross Onion Creek at least two times, and curve north to US 290 west of Dripping Springs; this road is unnecessary and would primarily serve to open up critical riparian land along and near Onion Creek to development



**Addition of four toll lanes (2 each way) to South Mopac, between Cesar Chavez and Slaughter lane** -- this \$800 to \$1 billion project would include a double decker bridge over Zilker Park and Lady Bird Lake, increase flooding, erosion and pollution of Barton Creek and the Barton Creek greenbelt; impose noise, ugliness, and distraction on all Austin High School students and faculty, and do nothing to actually deliver commuters from south of Lady Bird Lake into Downtown Austin. Enhanced telecommuting during the COVID-19 pandemic makes clear that this project is not really needed. The inside lane of the existing roadway, north and south bound, can and should be re-striped as rush hour high-occupancy vehicle lanes. Ramp metering should be considered as well (here as on I-35).

**SOS requests the following road projects be designated “scenic, conservation byways,” or some similar designation, and that the draft plan’s proposed roadway expansions be replaced with more affordable safety and conservation improvements that do not expand roadway capacity to any significant degree:**

1. Reduce the proposed expansion of RM 1826 to six lanes to no more than four lanes, and, where appropriate to two lanes with center and side turn lanes at major intersections;
2. Reduce the proposed expansion of FM 3237 to 2 lane divided with median and shoulders to appropriate safety improvements to the existing 2 lane road;
3. Reduce the proposed expansion of FM 2325 to 2 lane divided with median and shoulders to appropriate safety improvements to the existing 2 lane road;
4. Reduce the proposed expansion of Fitzhugh Road to 4 lanes to making safety improvements to the existing 2 lane roadway (from RM 12 to the Travis County line); Fitzhugh Road within Travis County should retain the existing 2-lane road, with safety improvements and appropriate turn lanes where needed to access neighborhoods and agri-tourism destinations;
5. Reduce the proposed expansion of FM 150 to a 4-lane divided highway be reduced to a 2-lane roadway with appropriate center and side turn lanes at key intersections, and with appropriate safety design specifications;
6. Reduce the proposed expansion of Hamilton Pool Road west of the Travis County line 2 lane divided with median and bike lanes and sidewalks to improvements to the existing 2 lane road with bike lanes (and compatible with Hamilton Pool Road improvements in Travis County);
7. Reduce the proposed expansion of RR 12 to four lanes to retain the existing 2 lane roadway, with safety improvements that include, where appropriate, center and side turn lanes and bike lane; and
8. Reduce proposed expansion of RM 32 by removing proposed median and substituting appropriate safety and conservation.

Thank you for your consideration. Please feel free to contact us should you have any questions.

Sincerely,

**Bill Bunch**  
Executive Director

**Kelly Davis**  
Staff Attorney

**Bobby Levinski**  
Staff Attorney

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March 9, 2020

Honorable Cynthia Long, Chair,  
Honorable Ann Kitchen, Vice Chair, &  
Capital Area Metropolitan Planning Organization  
Transportation Policy Board Members  
3300 N. Interstate 35, Suite 630  
Austin, Texas 78705

VIA EMAIL

**RE: Public commenting process on draft 2045 Regional Transportation Plan**

Dear Chair Long, Vice Chair Kitchen, and CAMPO Transportation Policy Board Members,

The undersigned organizations and individuals respectfully submit this letter to highlight the procedural inadequacies in the ongoing public comment period for the Draft 2045 Long-Range Regional Transportation Plan (draft plan). The comment period began on February 24, and is set to end on April 13. For the reasons discussed below, we request that the Board take immediate action to direct staff to rectify these deficiencies and extend the public comment period by at least forty-five days.

CAMPO is bound by federal law to provide citizens and other stakeholders “a ***reasonable opportunity*** to comment” on the draft plan. 23 U.S.C. § 134(6)(A) (emphasis added). For the reasons below, CAMPO is not currently furnishing such an opportunity.

**1. The Draft RTP for Public Review is Incomplete and Lacking in Critical Information Necessary to Provide a Reasonable Opportunity for Public Input.**

Federal law and regulations establish minimum standards for public involvement in developing a long-range transportation plan. *See* 23 U.S.C. § 134; 23 C.F.R. §§ 450.316, 450.318. A planning process that fails to allow public comment on a completed draft plan—one that discloses essential information and methodologies supporting the proposed network of proposed projects—fails to comply with minimum planning process requirements.

Public participation plans must, among other things, explicitly identify how an MPO will:

- Provide adequate public notice of public participation activities and time for public review and comment ***at key decision points***, including a reasonable opportunity to comment on the proposed metropolitan transportation plan;
- Providing timely notice and ***reasonable access to information about transportation issues and processes***;

- Making public information (***technical information*** and meeting notices) available in electronically accessible formats and means, such as the World Wide Web;
- Demonstrating explicit consideration and response to public input received during the development of the metropolitan transportation plan and the TIP.

23 C.F.R. § 450.316(1)(emphasis added).

The partial draft RTP available online and lack of access to supporting documentation deprives the public and stakeholders a reasonable opportunity to comment on the plan. The public draft is missing several sections required by federal law to be included in an RTP. *See* 23 U.S.C. § 134; 23 C.F.R. § 450.318. For example, the draft does not include a mitigation plan to reduce environmental degradation from transportation projects. At a minimum, every federally required component of the RTP should be publically disclosed in draft form and subject to public comment.

A legally sufficient public participation plan must “provid[e] an ***additional opportunity*** for public comment, if the final metropolitan transportation plan [] ***differs significantly*** from the version that was made available for public comment by the MPO and raises new material issues that interested parties could not reasonably have foreseen from the public involvement efforts.” 23 C.F.R. § 450.316(a)(1)(viii). The many placeholders and missing pieces in the current draft plan leave no doubt that the final version will be significantly different. The information that is still to be added is likely to raise new material issues. Thus, CAMPO must submit to public review a substantially completed draft plan with a corresponding extended comment period and outreach events.

Equally concerning is the lack of access to technical information supporting the document. The draft plan refers several times to placeholder appendices not available to the public (*e.g.*, “Appendix XX” at pp. 20, 25, 28, and 40). Failing to provide this critical information impairs the public’s ability to evaluate and understand the decisions made in the RTP. For example, the discussion of the financial plan omits the underlying data and methodology for estimating available federal and state funding, as well as demographic forecasting data, discussed below.

## **2. CAMPO Should Make Available Online The Background Planning Documents, Including The Demographic Forecasting Data.**

In carrying out its mandate to provide the public a reasonable opportunity to comment on the transportation plan, an MPO must “to the maximum extent practicable,” “make public information available in electronically accessible format and means, such as the World Wide Web.” 23 U.S.C. § 134(6)(C)(iii). The supporting regulations specify that the

public must have “reasonable access” to information about transportation issues and processes,” including “technical information” with adequate time to review and comment “at key decision points.” 23 C.F.R. § 450.316(a)(1).

CAMPO’s ongoing failure to provide public accessibility to population and employment forecasting data at the Transportation Analysis Zone (TAZ) level violates these federal standards. Complete and timely disclosure of the baseline and projected geographic distribution of population and employment is essential for there to be a meaningful and “reasonable” opportunity to comment on the draft plan. The baseline and projection distribution of people and jobs across the CAMPO region drives both the projected need (or lack thereof) for transportation projects set out in the draft plan. It also is necessary for traffic modelling to predict future congestion, time of travel, and the relative benefits of the proposed projects in the plan.

As such, the public has had no opportunity to view and comment on the TAZ-level population and employment distribution projections or on the methodology for estimating baseline, 2020, conditions, or projecting future conditions. Discussion during public meetings indicates that local officials and staff are also experiencing delay and frustration at obtaining TAZ-level data for each of the six CAMPO counties. How is this *regional* planning? There is no good reason for CAMPO staff having failed to either include this information in the draft plan or in the posted supporting documentation for the draft plan.

We ask the Board to direct CAMPO staff to make this information available on CAMPO’s website immediately. Other agency websites can provide guidance. The Alamo Area MPO hosts an open data portal that contains the type of information CAMPO should be providing.<sup>1</sup> The Texas Water Development Board (TWDB) is a good example. Similar to the MPO planning, the TWDB must develop long-range plans predicting future water-use every five years. Individual regions prepare plans that TWDB uses to put together a statewide plan. The TWDB makes publically available on its website a lengthy memo explaining its methodology and results for population forecasting, as well as a variety of GIS data.<sup>2</sup>

### **3. The Online Survey Does Not Allow an Adequate Opportunity to Provide Meaningful Public Comment on the Draft Plan.**

CAMPO’s 2045 website provides for only one way to submit public input of the draft RTP, by completing an online survey. The survey asks participants to select a maximum of five projects “that are important to you.” This could be interpreted in different ways, and participants are not asked to explain what they mean in selecting the projects. Participants

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<sup>1</sup><http://geoportal-mpo.opendata.arcgis.com/>

<sup>2</sup> <http://www.twdb.texas.gov/waterplanning/data/projections/index.asp>

may select projects as “important” because they have strong feelings on the project—for or against.

The survey asks only one demographic sorting question—zip code. Consequently, it is impossible to discern whether a diverse cross section of people gave public comment, or even learned of the opportunity to do so. Moreover, because the survey allows (indeed, encourages) comments to be submitted anonymously, there is no safeguard against one individual or interest group from stacking the results by submitting the same (or very similar) comments repeatedly.

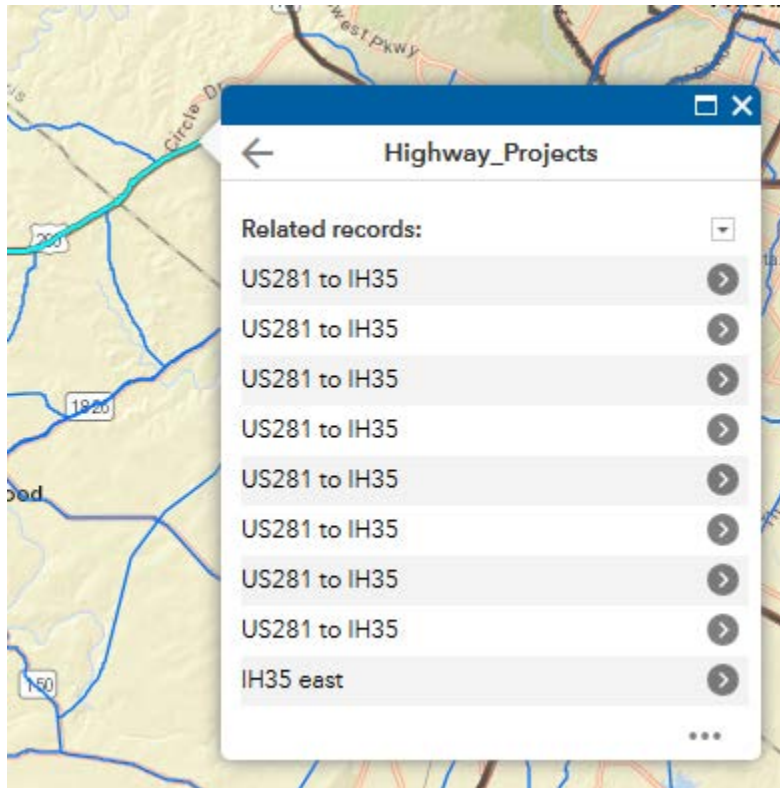
#### **4. The Online Map and Draft List of Projects Should be More User-Friendly and Informative.**

Visualization techniques are an important component for allowing public input. Indeed, federal law requires the use of visualization techniques to describe RTPs. 23 U.S.C. § 134(6)(C)(ii). Although we appreciate CAMPO staff’s effort to create an interactive map of projects in the 2045 RTP, we believe that the map contains some fundamental flaws that limit its usefulness in facilitating public understanding.

The map should have different color lines distinguishing new roads from road expansions. Currently, all road projects, regardless of design scope, are shown in a blue line. This makes it difficult to distinguish between new roads and expansions of existing roads. This problem is exacerbated by the misleading entries in the draft list of projects—some new roads are described in terms of adding lanes or shoulders. Those descriptions should be modified. Further, since there is no numbering of projects in the project list, with a corresponding number shown on the map, it is extremely difficult and time-consuming to cross reference the project list with the project shown on the map.

The draft list of projects should contain a key defining acronyms and technical terms. It is not reasonable to assume that the public would know that “NF” stands for new facility. And it is unclear what a divided versus undivided road is—is it divided by a center turn lane, a narrow concrete median, or a wide, grassy median? These variations can have major impacts on safety, environmental impact, and right-of-way acquisition, so it is important to clarify for the public. Terms such as “2x2 NTML” provide no information to the lay person as to what is being proposed. One set of term definitions also minimizes the possibility that different project sponsors have incompatible understandings of those terms.

Some road projects are broken up into various segments in the draft list, but those segments are not differentiated visually on the map. Clicking on any point of a road brings up a list of segments, all with identical titles. For example, clicking anywhere along the length of “US 290” (east or west) pulls up this:



Each entry is a different segment, but clicking on a particular entry does not isolate the segment visually. The entire roadway remains highlighted.

Other modifications that would facilitate meaningful public review include:

- The draft list and map should have a project number tied to each project, so that stakeholders can cross-reference the projects on the map with those on the list.
- An effort should be made to identify roads consistently across projects. For example, the same roadway is variably identified in the plan as “FM 3238” and “Hamilton Pool Road.”
- The map and draft list of projects should include the lengths of each project.
- The draft list of projects should be made available in its native, spreadsheet format. The online draft list contains 642 projects over 62 pages. Stakeholders should have the option to view the list in a format that allows them to organize and categorize such a large amount of information. It does not seem like it would be difficult for CAMPO staff to provide the file in the program that it was created.

Our organizations have significant concerns about the substance of the draft plan and its major components. However, these initial comments were necessary to draw the Board’s attention to some of the shortcomings in the planning and public engagement process, to request that required information, including a completed draft plan, be posted immediately on the CAMPO 2045 website, and to request an extension of the comment period.

Thank you for your consideration.

Respectfully,

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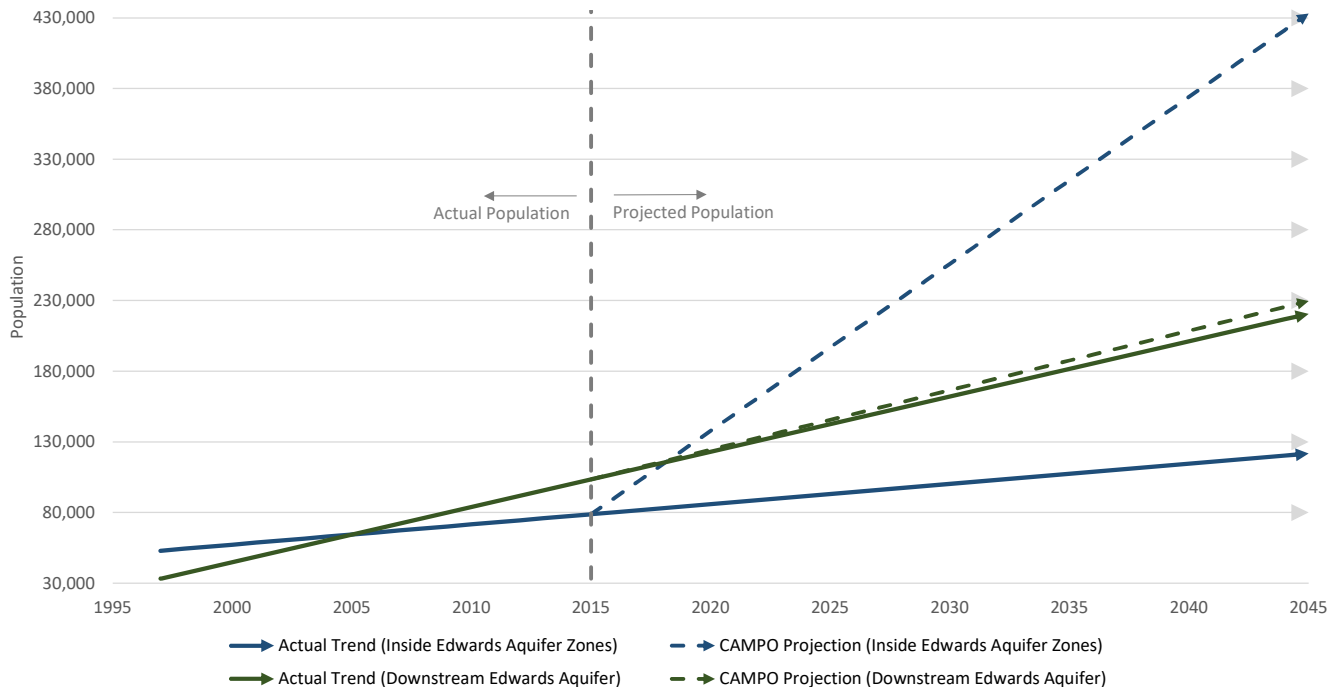
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# Hays County Growth Projections

## Within and Downstream of the Edwards Aquifer Watershed

Comparison of Actual Population Trends and CAMPO 2045 Projections



Sources: Aquifer delineation from Texas Commission of Environmental Quality; 1997 population from 2003 CAMPO model files; 2015 population and 2045 projections from CAMPO 2045 Draft Plan demographics website.

# Hays County Growth Projections

## Within and Downstream of the Edwards Aquifer Watershed

Comparison of Actual Population Trends and CAMPO 2045 Projections



	Actual Population Trend Inside Edwards Aquifer Zones	CAMPO Projection Inside Edwards Aquifer Zones	Actual Population Trend Downstream Edwards Aquifer Zones	CAMPO Projection Downstream Edwards Aquifer Zones
1997	52,949	52,949	33,172	33,172
2015	78,740	78,740	103,455	103,455
2045 Projections	121,725	433,162	220,593	229,635
Population Change (2015-2045)	<b>42,985</b>	<b>354,422</b>	<b>117,138</b>	<b>126,180</b>

Discrepancy Between CAMPO Projection and Actual Population Trend (Inside Aquifer)	<b>311,437</b>
Discrepancy Between CAMPO Projection and Actual Population Trend (Downstream Aquifer)	<b>9,042</b>

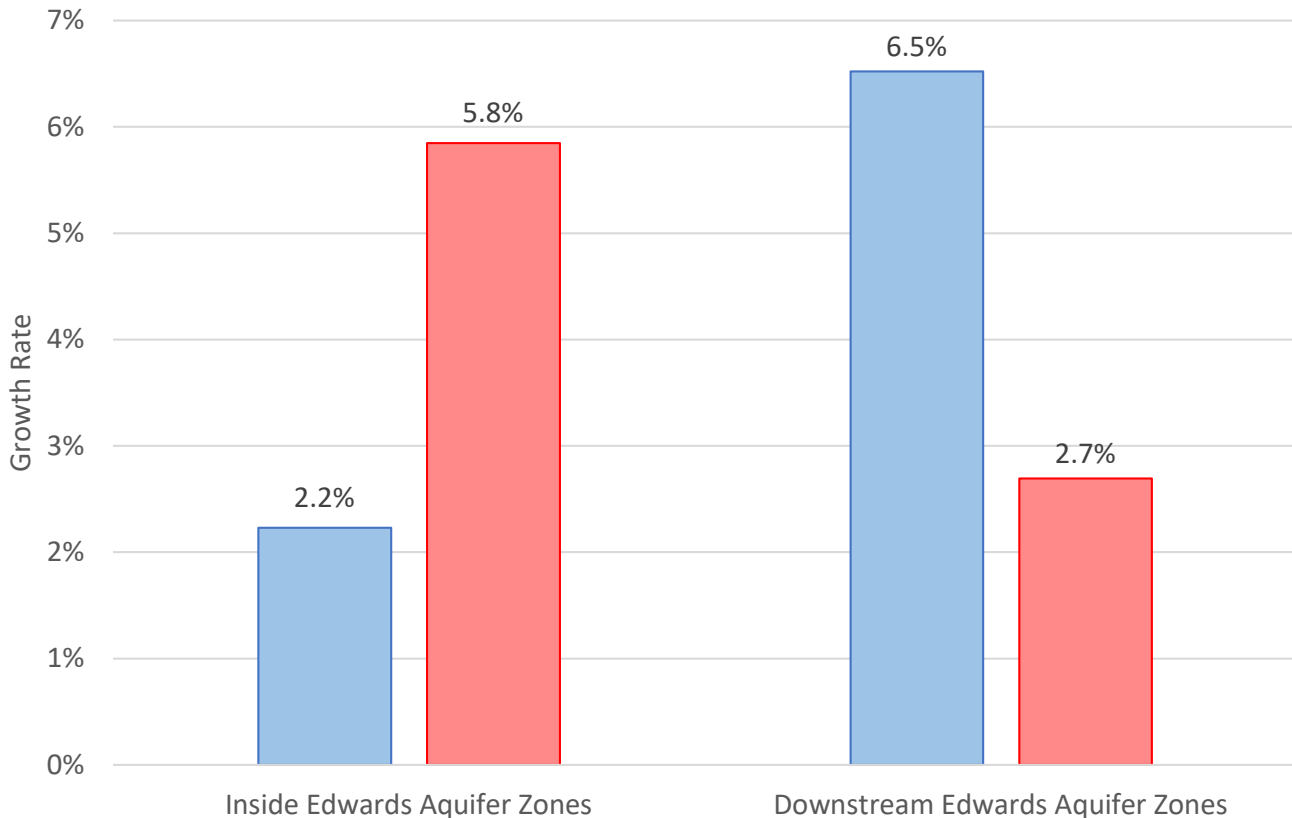
Sources: Aquifer deliniation from Texas Commission of Environmental Quality; 1997 population from 2003 CAMPO model files; 2015 population and 2045 projections from CAMPO 2045 Draft Plan demographics website.

# Hays County Growth Projections

## Within and Downstream of the Edwards Aquifer Watershed



■ 1997-2015 (Actual Population Growth)     ■ 2015-2045 (CAMPO Projection)



Sources: Aquifer delineation from Texas Commission of Environmental Quality; 1997 population from 2003 CAMPO model files; 2015 population and 2045 projections from CAMPO 2045 Draft Plan demographics website.



## CAMPO 2045 Projects by Year

## New Roads

## Expansion Projects

## — Highway Projects

--- 2020 - 2025

— 2020 - 2025

 Recharge Zone

--- 2026 - 2030

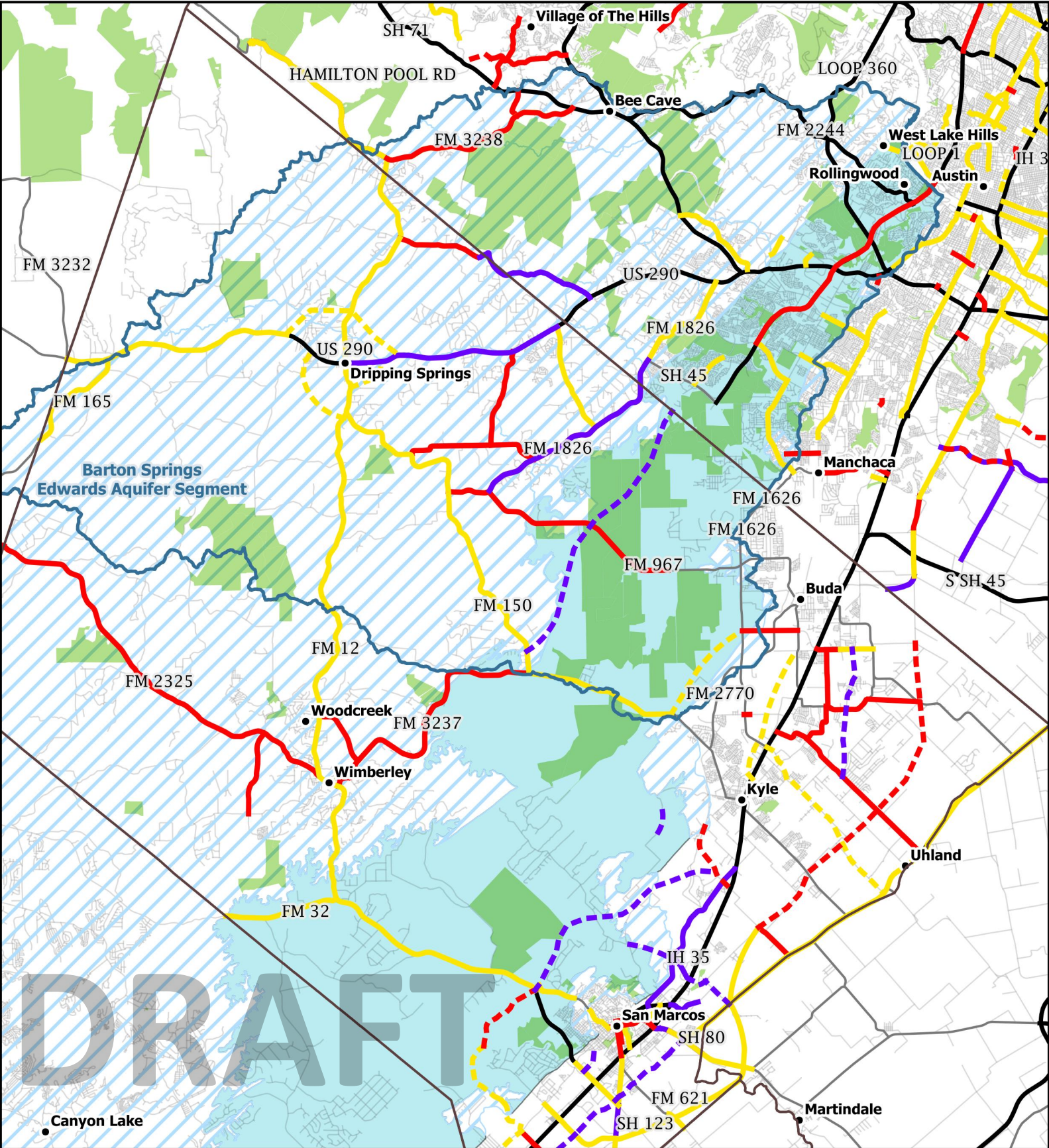
— 2026 - 2030

 Contributing Zone

--- 2031 - 2045

— 2031 - 2045

 Conservation Lands



Map Created by Stephen Ramirez on 3/31/2020

0      2.5      5      7.5      10 Mi





**Road Projects in the Barton Springs Watershed in CAMPO 2045 Plan**  
Travis County

**Bold type = Projects with a Let Year of 2025 or earlier**  
Blue cells= Recharge Zone. Grey cells= Contributing Zone

Project Sponsor	Roadway/ Facility Name	Description	Limits From	Limits To	Limits At	Let Year	Anticipated Total Cost	TIP Window	Local	MPO Score	NOTES
CTRMA	SL 1	2 tolled express lanes in each direction	Cesar Chavez	Slaughter Lane		2022	\$540,000,000	Yes	Yes	NA	BSRZ
Travis County	Hamilton Pool Rd	Upgrade existing 2-lane undivided to include wide outer shoulders	Travis County line	RR 12		2020	\$5,060,000	Yes	Yes	NA	
Travis County	Vail Divide Rd	Widen 2-lane & construct new 4-lane divided with bike lanes & sidewalks	SH 71 W	RR 3238 (Hamilton Pool Rd)		2025	\$15,400,000	No	Yes	NA	BSCRZ & adds new road crossing Little Barton Creek
Travis County	Fitzhugh Rd (Phase 1)	Upgrade existing 2-lane roadway to a 2-lane divided roadway with bike lanes & sidewalks	US 290 W	Barton Creek Bridge		2036	\$59,412,000	No	Yes	NA	BSCRZ + crosses Barton Creek + not part of other Fitzhugh
TxDOT	RM 2244	Widen 4-lane undivided to 4-lane with continuous left turn lane and shoulders	Walsh Tarlton	Montebello		2025	\$10,000,000	No	Yes	NA	BSRZ
TxDOT	RR 3238 (Hamilton Pool Rd)	Add shoulders & center turn lane	RR 12	SH 71		2021	\$16,200,000	Yes	No	NA	
TxDOT	RM 620	Widen from 4 to 6-lane divided roadway	SH 71	Aria Dr/ Cavalier Dr		2022	\$37,039,200	Yes	No	NA	
TxDOT	SL 360	Add continuous frontage roads & grade separations	RM 2244	MoPac Expressway		2025	\$99,000,000	No	No	NA	BSRZ
City of Austin	Escarpment Boulevard	Widen existing 2-lane undivided and construct new 4-lane divided with pedestrian/ bicycle & transit improvements	La Crosse Avenue	SH 45 SW		2027	\$18,854,671	No	Yes	NA	
City of Austin	Brodie Lane	Reconstruct 2-lane undivided to 2-lane undivided with center turn lanes and pedestrian/ bicycle & transit improvements	Slaughter Lane	FM 1626		2027	\$23,439,377	No	No	NA	
City of Austin	Davis Lane	Widen 2-lane undivided to a 2-lane with continuous left turn lanes and pedestrian/ bicycle & transit improvements	Brodie Ln	Manchaca Rd		2027	\$13,353,095	No	Yes	NA	
City of Austin	Industrial Oaks Boulevard	Widen existing 4-lane undivided and construct a new 4-lane divided with pedestrian/ bicycle & transit	Southwest Parkway	US 290		2027	\$5,763,781	No	Yes	NA	
City of Austin	Old Bee Caves Road	Widen 2-lane undivided to a 2-lane undivided with center turn lanes and pedestrian/ bicycle & transit	Mountain Shadows	US 290		2027	\$21,568,588	No	Yes	NA	Not a short distance
City of Austin	Old Bee Caves Road	Widen 2-lane undivided to a 2-lane undivided with center turn lanes and pedestrian/ bicycle & transit improvements	SH 71	Mountain Shadows		2027	\$9,332,122	No	Yes	NA	

City of Austin	South Lamar Boulevard	Retrofit 4-lane undivided with continuous left turn lane to a 4-lane divided with pedestrian/ bicycle & transit improvements	Barton Springs Road	Loop 360		2027	\$11,159,101	No	Yes	NA	
City of Austin	Vega Avenue	Widen existing 2-lane undivided & construct new 4-lane divided with pedestrian/bicycle & transit improvements	Southwest Parkway	Eiger Road/ Patton Ranch		2027	\$8,793,056	No	Yes	NA	
City of Austin	West Slaughter Lane	Widen 4-lane divided to a 6-lane divided with pedestrian/ bicycle & transit improvements	MoPac Expressway	Brodie Lane		2019	\$15,726,250	No	Yes	NA	
City of Austin	West William Cannon Drive	Widen 4-lane divided to a 6-lane divided with pedestrian/ bicycle & transit improvements	Brodie Lane	Menchaca Road		2027	\$20,648,286	No	Yes	NA	
Travis County	Hamilton Pool Rd	Upgrade 2-lane undivided to a 2-lane divided with bike lanes & sidewalks	East side of Pedernales River	RR 12		2028	\$52,401,000	No	Yes	NA	Hill Country, crosses into BSCZ
TxDOT	SH 71	Widen from 4-lane undivided to 6-lane divided	Blanco County Line	Silvermine		2035	\$468,245,311	No	No	85	Very long segment. BSCZ + Crosses
TxDOT	US 290	<b>Widen from 4-lane to 6-lane divided, add frontage roads</b>	<b>RM 1826</b>	<b>RR 12</b>		<b>2025</b>	<b>\$1,166,136,448</b>	<b>No</b>	<b>No</b>	<b>80</b>	<b>Spans across Travis &amp; Hays Counties.</b>
TxDOT	RM 1826	Widen 2-lane roadway to 4-lane divided roadway	SH 45	US 290		2029	\$28,420,690	No	No	79	
City of Bee Cave	Hamilton Pool Road Connector	New roadway connection between RR 3238 (HPR) & RM 2244	RR 3238, approx. 2,300 ft. S of SH-71	RM 2244	SH-71	2026	\$7,000,000	No	No	61	

**TOTAL \$2,652,952,976**

Road Projects in the Barton Springs watershed in CAMPO 2045 Plan - Travis County

**Road Projects in the Barton Springs Watershed in CAMPO 2045 Plan  
Hays County**

**Bold type = Projects with a Let Year of 2025 or earlier**

Blue cells= Recharge Zone. Grey cells= Contributing Zone

Project Sponsor	Roadway/ Facility Name	Description	Limits From	Limits To	Limits At	Let Year	Anticipated Total Cost	TIP Window	Local	MPO Score	NOTES
Hays County	Sawyer Ranch Rd (CR 164)	<b>Widen from 2 to 4-lane divided</b>	<b>US 290 W</b>	<b>Darden Hill Rd</b>		<b>2020</b>	<b>\$11,500,000</b>	<b>Yes</b>	<b>Yes</b>	<b>NA</b>	
Hays County	Kyle Loop (NF 17)	Construct new 4-lane divided	FM 150 W	FM 1626		2030	\$10,400,000	No	Yes	NA	NEW ROAD thru BSBZ
Hays County	FM 150 W	Widen from 2-lane divided to 4-lane divided	RR 12	RM 1826		2030	\$5,700,000	No	Yes	NA	
Hays County	FM 150 W	Widen from 2-lane divided to 4-lane divided	RM 1826	FM 3237		2030	\$19,000,000	No	Yes	NA	
Hays County	RR 12	Widen from 2-lane divided to 4-lane divided	Fitzhugh Rd	FM 150 W		2030	\$7,100,000	No	Yes	NA	BSCZ + crosses Barton Creek
Hays County	RR 12	Add shoulders, median and turn lanes to 2-lane divided	RR 3238 (HPR)	Fitzhugh Rd		2030	\$14,200,000	No	Yes	NA	BSCZ

Hays County	NF 2 (Dripping Springs)	Construct new 4-lane divided	US 290 W	US 290 Bypass		2030	\$10,100,000	No	Yes	NA	NEW ROAD thru BSCZ
Hays County	NF 10 (Dripping Springs)	Construct new 4-lane divided	RR 12	US 290 Bypass		2030	\$3,700,000	No	Yes	NA	NEW ROAD thru BSCZ
Hays County	Darden Hill Rd	Widen from 2 to 4-lane divided	FM 150 W	RM 1826		2025	\$30,000,000	No	Yes	NA	BSCZ
Hays County	Fitzhugh Rd (CR 101)	Widen from 2 to 4-lane undivided	RR 12	Travis County line		2025	\$5,500,000	No	Yes	NA	BSCZ
Hays County	Nutty Brown Rd (CR 163)	Add shoulders & safety improvements to 4-lane divided	US 290 W	RM 1826		2030	\$10,500,000	No	Yes	NA	BSCZ
Hays County	Kyle Loop W (NF 17)	Construct new 4-lane with a continuous turn lane	FM 1626	NF 17		2025	\$10,000,000	No	Yes	NA	NEW ROAD thru BSRZ
Hays County	NF 18 - Dripping Springs	Construct new 2-lane divided	RR 12	US 290 W at Holder		2030	\$29,300,000	No	Yes	NA	NEW ROAD thru BSCZ
Hays County	Robert S. Light Blvd	Widen from 2 to 4-lane divided AND BUILD A WHOLE NEW ROAD	RM 967	FM 1626		2025	\$23,000,000	No	Yes	NA	NEW ROAD thru BSRZ & BSCZ
Hays County	Rutherford Ranch Bypass (NF 13)	Construct new 2-lane undivided	FM 150 W	Travis County line		2035	\$25,000,000	No	Yes	NA	New road thru BSRZ & Austin WQPL
Hays County	FM 165	Add shoulders & safety improvements to 2-lane undivided	US 290 W	Blanco County line		2030	\$28,200,000	No	Yes	NA	BSCZ
Hays County	RM 967	Widen from 2 to 4-lane undivided	RM 1826	1.5 mile west of Oak Forrest		2025	\$7,800,000	No	Yes	NA	
TxDOT	RM 1826	Widen existing 2-lanes to proposed 6-lane divided	RM 967	SH 45		2035	\$226,630,731	No	No	72	BSCZ. Mostly in Hays, portion in Travis
TOTAL							\$477,630,731	Road Projects in the Barton Springs watershed in CAMPO 2045 Plan - Hays County			

**Road Projects in the Southern Segment Edwards Aquifer (Blanco Watershed) in CAMPO 2045 Plan  
Hays County**

**Bold type = Projects with a Let Year of 2025 or earlier**

Blue cells= Recharge Zone. Grey cells= Contributing Zone

Project Sponsor	Roadway/ Facility Name	Description	Limits From	Limits To	Limits At	Let Year	Anticipated Total Cost	TIP Window	Local	MPO Score	NOTES
Hays County	Kyle Loop W	Construct new 4-lane divided	NF 17	Old Stagecoach Rd		2025	\$15,500,000	No	Yes	NA	New road + small portion SSCZWTZ
Hays County	RM 32	Add shoulders, median and turn lanes to 2-lane divided	RR 12	Comal County line		2030	\$25,900,000	No	Yes	NA	SSRZ, crosses Purgatory Creek, undeveloped area
Hays County	FM 2325	Add shoulders, median and turn lanes to 2-lane divided	Blanco County Line	Jacobs Well		2025	\$48,400,000	No	Yes	NA	SSCZ + runs parallel to Cypress Creek
Hays County	FM 2325	Add shoulders, median & turn lanes to 2-lane divided	Jacobs Well Rd	RR 12		2025	\$14,800,000	No	Yes	NA	SSCZ

Hays County	Jacobs Well Rd (NF 25)	Construct new 2-lane undivided with shoulders	RM 2325	Wayside Dr		2025	\$13,800,000	No	Yes	NA	SSCZ + new road!
Hays County	RR 12	Add shoulders, median and turn lanes to 2-lane divided	FM 150 W	Winters Mill		2030	\$74,500,000	No	Yes	NA	SSCZ + crosses Onion Creek & S. Onion
Hays County	RR 12	Add shoulders, median & turn lanes to 2-lane divided	FM 3237	RM 32		2030	\$29,900,000	No	Yes	NA	SSRZ & SSCZ + crosses Blanco River
Hays County	RR 12	Widen from 2-lane parkway to 4-lane parkway	RM 32	Old RR 12 / SH 80		2030	\$117,500,000	No	Yes	NA	SSRZ- long stretch
Hays County	RM 3237	Add shoulders, median & turn lanes to 2-lane divided	RR 12	Flite Acres Rd		2025	\$2,800,000	No	Yes	NA	SSCZ
Hays County	RM 3237	Add shoulders, median & turn lanes to 2-lane divided	Flite Acres Rd	Winters Mill		2025	\$3,100,000	No	Yes	NA	SSCZ
Hays County	RM 3237	Add shoulders, median & turn lanes to 2-lane divided	Winters Mill	FM 150 W		2025	\$2,100,000	No	Yes	NA	Long stretch crossing SSRZ & SSCZ - and
Hays County	RR 12	Construct new 2-lane divided	Winters Mill	FM 3237		2030	\$14,300,000	No	Yes	NA	New road. SSCZ
City of San Marcos	Old RR 12 Bike/Ped & Widening	Reconstruct 2-lane with interinent left turn lane to 2-lane with continuous turn lane & pedestrian/ bicycle improvements	RR 12	Craddock Ave		2028	\$7,500,000	No	Yes	NA	SSRZ& CZWTZ
City of San Marcos	River Ridge Pkwy	Construct new 4-lane divided boulevard with pedestrian/ bicycle	Lime Kiln Rd	I-35		2035	\$73,700,000	No	No	81	BSRZ + new road
City of San Marcos	Proposed Parkway Loop (PH-0)	Construct new 4-lane divided with off- street shared paths	La Cima Tract Boundary	Proposed Blvd 1		2030	\$62,200,000	No	No	72	SSRZ & crosses Purgatory Creek
City of San Marcos	Proposed Parkway Loop (La Cima Tract)	Construct new 4-lane divided with off-street shared paths	RR 12	Proposed Parkway Loop		2025	\$63,500,000	No	No	77	SSRZ & crosses Purgatory Creek. Opens up a bunch of
City of San Marcos	Proposed Parkway Loop	Construct new 4-lane divided with off-street shared paths	Yarrington Road	RR 12		2045	\$460,000,000	No	No	79	BSRZ + new road thru undeveloped land.
City of San Marcos	Centerpoint Road extension	Construct new 4-lane divided with off-street shared paths	Proposed Blvd 1	FM 2439/ Hunter Road		2030	\$62,200,000	No	No	66	SSRZ & CZTZ. Part of SM NW Loop
TOTAL							\$1,091,700,000	Road Projects in the Southern Segment Edwards Aquifer (Blanco Watershed) in CAMPO 2045 Plan - Hays County			