



October 10, 2020

To: Hays Country Transportation Planning Team  
From: Bill Bunch, Executive Director, Save Our Springs Alliance  
RE: Early comments on initial Hays County Transportation Plan update work

Please consider these comments together with the attached slides previously provided to the Hays County Commissioners Court as comments on the then-proposed CAMPO 2045 plan, as well as the attached letter to Hays County Commissioner Mark Jones and San Marcos Mayor Jane Hughson on the same subject.

First, we were not made aware of this comments period, and only learned about it by happenstance. We asked to be included on an email news list that will keep interested persons informed of the process and how they might participate.

Save Our Springs Alliance has over 250 members living in Hays County and other members who own property in Hays County. SOSA works to protect the Edwards Aquifer and its Great Springs, including San Marcos and Barton, and the streams that contribute to those springs. Development that happens in western Hays County directly threatens the quality and quantity of flows at the springs as well as the county and quality of Edwards Aquifer sourced drinking water that is the primary drinking water supply for the central Texas region.

In planning Hays County's future transportation and other public and private investments, the starting point should be the recognition of the fundamental fact of nature that naturally divides Hays County between western Hays County, on and upstream of the porous, prolific and vulnerable Edwards Aquifer recharge zone, and eastern Hays County downstream of the Edwards Aquifer watershed.

In western Hays County, public and private priorities should be to save as much open, protected watershed land as possible. Rather than expand roads and build new ones, the county should instead buy more conservation easements as a "traffic demand management" strategy that also prevents flooding downstream, along the I-35 corridor, protects vulnerable water supplies and endangered species habitats, and preserves the scenic Hill Country beauty that is essential to the outdoor recreation and agri-tourism economy of the region. This open space "green infrastructure" is far cheaper than building the new and expanded roads in western Hays County included in the existing Hays County Transportation Plan and the CAMPO 2045 plan, Keeping western Hays County green, forever, would also help prevent immeasurable losses that Hays County residents would suffer from increased flooding

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downstream, along the I-35 corridor, and from pollution of the drinking water and spectacular spring and river flows that make Hays County such a great place to live and to visit.

Specifically, the proposed new loops around Wimberley and Dripping Springs, and around the western sides of San Marcos and Kyle should be eliminated from the plan. The extension of Escarpment from Travis County should be removed from the county's plan. The other roads listed in the attached slide number 3 should be removed or reduced in scale, as noted.

Especially noteworthy, FM 150 should be scaled back from a 4 lane divided highway to a two lane highway with turn lanes, shoulders, and other safety enhancements. Virtually all of the public input in the FM 150 character planning process supported a small, rural highway with safety improvements, in direct conflict with the final report recommending a four lane divided highway all the way to RM 12 and beyond, looping around the south side of Dripping Springs to connect to US 290 west of Dripping Springs.

The argument has been given that "if we don't do that" 4-lane divided, TxDOT will force something even worse on top of us." That is simply false. There is nowhere near the traffic counts or rational prediction of growth along FM 150 in western Hays County to justify a 4-lane divided highway, much less "something worse." TxDOT has limited funds and limited political capital, and has no interest forcing a giant highway slicing across Hays County against the will of residents, voters, and local officials.

The "virtual open house" video posted on the Hays County Transportation Plan site points to "data" from the CAMPO 2045 plan as the only reference for projected population growth and distribution of that population growth, as well as for projected job growth and distribution of that job growth. From this "data" – population and job projections—future traffic counts and patterns are projected.

The CAMPO 2045 plan projections are completely wrong, with no basis in rational planning, especially as to the projected distribution of population growth. As shown in the attached slides, prepared by transportation expert Norm Marshall of Smart Mobility, the actual population growth trends show that the vast majority of Hays County population growth is taking place in eastern Hays County, along I-35 in the San Marcos/Buda/Kyle corridor. Based on historic trends, the CAMPO 2045 population growth projections grossly overestimate future growth in western Hays County while underestimating growth in the eastern I-35 corridor.

Specifically, actual growth trends would add about 43,000 people to western Hays County (over and upstream of the Edwards Aquifer) over the next 25 years. The CAMPO 2045 plan predicts an additional 354,000 people will move into western Hays County over the next 25 years. Actual growth trends would place an additional 117, 000 people in eastern Hays County over the next 25 years; the CAMPO 2045 plan predicts 126,000 more people in this preferred growth area. (See graph and charts on slides 7, 8, and 9, attached).

The subsequent slides pull out a few "Traffic Analysis Zones," or TAZs, located in western Hays County from the CAMPO 2045 growth distribution projections. These TAZ examples

show just how completely absurd the CAMPO 2045 projections really are. This CAMPO 2045 “data,” and the traffic congestion that it predicts when crunched through the CAMPO transportation model should be discarded wholesale in favor of rational, standard planning practices.

Population growth projections should, at minimum, reflect actual, existing trends. Planning that recognizes the unique and critical natural features of the county would seek to bend existing trends toward directing a larger share of future growth to eastern Hays County while reducing the much lower rate of growth in western Hays County to an even lower rate. Instead, the CAMPO 2045 plan, and, in turn, the existing Hays County Transportation Plan, go in the opposite direction -- grossly inflating population growth trends for western Hays County and the road network needed to serve western Hays County.

Conversely, growth should be supported with roadway, public transit, and other public and private infrastructure investments in eastern Hays County. These growing cities along I-35 will greatly benefit by being on the “edge of the Hill Country,” rather than be engulfed by the 360 degree sprawl contemplated by the CAMPO 2045 plan and the existing Hays County Transportation Plan. Since eastern Hays County is actually growing rapidly, limited transportation dollars should be spent providing the improvements needed to support this growth.

The next to last slide attached contains a quote from Michael Dell on how the current pandemic has shown us that for many of us, we won’t ever again need to drive to work every day. Commuting – which drives the bulk of traffic congestion during morning and evening “peak” hours –has been changed forever. While people may not work from home as much as they do now, many employers will never again require their employees show up at the office every Monday through Friday between the hours of 8 and 5.

This new world of telecommuting, together with other technology improvements, will greatly reduce congestion from what has been experienced and from what has previously been predicted. The updated Hays County Transportation Plan should incorporate these changing commuting patterns by, primarily, reducing the projected “need” for bigger roads and more new ones.

We will provide additional comments as this process goes on. Please do keep us informed about the process, and please also post our comments and those of others on the transportation plan update website.

Thank you in advance for your consideration.