



David Baker, Executive Director
Malcolm Harris, President
Pokey Rehmet, Treasurer
Jason Pinchback, Secretary
Scott Price
Dorothy Knight
Parc Smith
Vanessa Puig-Williams

Dear CAMPO board members and staff,

The Wimberley Valley Watershed Association appreciates the hard work and awesome challenge for the elected officials serving on the board and the transportation planners and population forecasters working to develop transportation priorities for one of the fastest growing metropolitan areas in the United States.

The WVWA request more time from the CAMPO board and ask that you extend the public comment period and hold off on approving the current plan until the Covid19 crisis has ended and an appropriate public participation process can be allowed. WVWA offers the following brief comments and suggested changes to scale back many of the proposed new roads and unnecessary expansions in Hays County. We believe the current configuration of the CAMPO plan is not aligned with accurate population projections and desires of a majority of stakeholders in Hays County. WVWA and the citizens in Hays County deserve more time to evaluate the billion dollar road plan proposed by CAMPO.

WVWA supports expanding investment in watershed protection, green infrastructure and focusing tax payer dollars to further protect land in Western Hays County and over the Edwards Aquifer Recharge zone that will provides clean plentiful water in our aquifers and springs. The current proposed transportation expansion threaten the tremendous investment that Hays County citizens, the City of Austin, Kyle, Buda and the City of San Marcos have made in protecting critical open space lands over the Edwards Aquifer Recharge Zone and in the sensitive watersheds in Western Hays County.

We invite the CAMPO staff and board to please review the goals and new rules recently established for the Jacob's Well Groundwater Management Zone and Blanco Regional Recharge Zone that are in conflict with the suggested new roads in the plan. Through a multiyear stakeholder process and years of aquifer science and research by the Hays Trinity Groundwater Conservation District these two management zones were established through extensive scientific research and active involvement of Hays County Commissioner Lon Shell and regional Water Utilities, Municipalities, developers, landowners, the Wimberley Independent School District and Buissness owners that found consensus on seven key recommendations that ultimately informed the rules that established the GMZ's.

<http://haysgroundwater.com/management-zones-draft-rules>

The intention of these rules are to better manage the Trinity Aquifer to insure sustainable water supply and healthy spring flows at Jacob's Well and Pleasant Valley Springs the primary source of flow in the Blanco that contributes significant recharge to Barton Springs during times of drought. Scalling back large road expansions and new roads in this area will help discourage sprawl development that will ultitimately conserve these important open spaces that are the basis of the tourism economy in Western Hays County.

- Specific issues:
 - CAMPO should consider establishing the creation of a "Hill Country Scenic" roadway designation that gives priority to safety, scenic beauty, agri-tourism, and watershed protection, and NOT capacity expansion for unsustainable sprawl development.
 - In the Wimberley Valley area, key roads to designate as Hill Country Scenic are FM150, RR12 from Dripping Springs to San Marcos, Jacobs Well Road, FM 1826, FM 2335, FM 3237 between Wimberley and Kyle and Winters Mill Parkway. These roads should not be expanded; instead, they should be protected as scenic roadways because they are integral parts of the regional charm and beauty that is essential to the tourism economy in Hays County and the Texas Hill Country.
 - We believe the tremendous allocation of funds by Hays County and the City of Austin in land conservation and resource protection will be harmed by the current CAMPO transportation vision for Hays County. The Hill Country Scenic roadway designation would save considerable funding and allow a large portion of the savings to be redirected to the 1-35 corridor and make available expanded resources to purchase land for parks and open space including conservation easements in these sensitive watersheds.
 - Land conservation is the best, most cost effective, and most publicly favored "Transportation Demand Management" strategy for the Hill Country.
 - The CAMPO plan contains several large road expansions in Western Hays and through the City of Austin's water quality protection lands that should be removed from the plan.

- Problematic elements to the CAMPO plan
 - Population and employment projections for western Hays County overestimate population and job increases. The projections are a dramatic departure from historic trends.
 - These inflated population and jobs growth projections translate to excessive "demand" for new roads that is neither sensitive to public sentiment to limit growth and keep Western Hays rural nor acknowledges the limited and environmentally sensitive water resources of the Edwards and Trinity Aquifers.
 - CAMPO should remove the following roads from the plan the new segment of Jacob's Well Road to Wayside Drive, remove the San Marcos and Dripping Springs Loops and the expansion of FM 150 and Escarpment Road over the City of Austin's Water Quality Protection lands. Reinstate the Lone Star Rail into the CAMPO plan.
 - Remove the proposed extension of Escarpment Boulevard from SH 45 SW to FM 150 (aka, the "Rutherford Ranch Bypass"; NF 13);
 - Remove the proposed extension/realignment of Jacob's Well Road (NF 25);
 - Remove the proposed expansion of FM 150 to US 290, from RM 12 to US 290 West;
 - Remove the proposed new loop around the northern side of Dripping Springs (NF 2; NF 10; NF 18);
 - 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;
 - 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;
 - 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;
 - 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);

- 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, and with appropriate safety design specifications;
- 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; and
- Remove that portion of the proposed Kyle Loop between RM 1626 and FM 150;

The draft plan also fails to even mention climate change or potential strategies to mitigate the environmental impact of all these roads. The WVWA respectfully request more time to fully evaluate and engage with the Hays County Commissioners and stakeholders to recommend specific modifications to the current plan that are in alignment with the natural resource restraints and desired conservation development strategies and land, water, transportation vision currently being developed by Hays County Commissioners.

Sincerely,



David Baker
Executive Director
Wimberley Valley Watershed Association