



MEMORANDUM

TO: Mayor and Council Members

CC: Marc A. Ott, City Manager
Robert Goode, P.E., Assistant City Manager

FROM: Robert Spillar, P.E., Director 
Austin Transportation Department

DATE: April 1, 2015

SUBJECT: **CAMPO 2040 Regional Transportation Plan, City of Austin Staff comments**

For a transportation project to qualify for federal funding of any kind, it must be included in the region's long-range transportation plan. The deadline for adopting the *CAMPO 2040 Regional Transportation Plan* is May 24, 2015. However, the Plan is typically amended each year, often multiple times a year, to account for updated information on projects and funding sources. The Plan must also go through a major update every five years in accordance with federal requirements.

The CAMPO Plan update began shortly after the adoption of the CAMPO 2035 Plan, and city staff has participated throughout the process in the Technical Advisory Committee and multiple subcommittees. A history of Board and Technical Advisory Committee (TAC) actions leading up to the development of the draft plan can be found on the [CAMPO website](#). To the extent possible, City staff has ensured the inclusion of City projects, programs, and policies in the draft plan. In this memorandum, we provide an overview of staff comments to be submitted to CAMPO as technical comments.

The Public Comment period began with the release of the 2040 Plan on Monday, March 2nd and will close on Thursday, April 2nd. An online survey was available during this time, as well as two public meetings in each county. The public could also submit comments by phone (512-974-2275) or by mail (CAMPO at P.O Box 1088, Austin TX 78767). The schedule of public hearings is available on CAMPO's website, including the meeting in Austin at One Texas Center on Wednesday, April 1st from 5:30 to 7:30pm.

City of Austin staff conducted a technical review of the CAMPO 2040 Plan and developed the attached, detailed comments and overall summary of issues of concern on several projects and policies. Staff developed these comments by comparing the proposed CAMPO 2040 Plan with adopted City plans/policies, engineering standards, and City mobility goals to determine inconsistencies. For example, some proposed projects in the CAMPO 2040 Plan conflict with the *Imagine Austin Comprehensive Plan*. Technical comments are due no later than Thursday, April 2, 2015; city staff will be submitting comments accordingly.

The Transportation Policy Board (TPB) will consider all comments received at their regularly scheduled meeting on April 13th. CAMPO staff will then finalize the plan and present it to the Transportation Policy Board (TPB) for their adoption at their May 11th meeting.

Please let us know if you need additional information.

cc: W. Gordon Derr, P.E.
Council Executive Assistants
Staff

City of Austin staff comments on the CAMPO 2040 Plan

City of Austin staff is submitting the attached comments on the CAMPO 2040 *Regional Transportation Plan*. Issues of most concern to the City on several projects and policies are summarized below.

Projects

City staff generally concurs with the projects contained within the CAMPO 2040 *Regional Transportation Plan*. However, based on City policy, enumerated in the *Imagine Austin Plan Comprehensive Plan* and subsequent Council actions, staff will continue to request objection to SH 45 and related projects included in the 2040 Plan. These projects, as well as others proposed in environmentally-sensitive areas, are illustrated in *Map 1* and outlined as follows:

- **Loop 1, Cesar Chavez to Slaughter, Road Project ID: 102, Sponsor: CTRMA, page 167**
This project is described as increasing the capacity of Loop 1 South with two express lanes in each direction. This differs from what was in the previous, CAMPO 2035 *Regional Transportation Plan*, which proposed the project as only one express lane in each direction. City staff has serious concerns regarding the technical feasibility of the project and the evaluation of the impacts of the project on connecting roadways, as well as the environmental implications of the surrounding area. Moreover, the project is entirely in the City of Austin and Travis County jurisdictions, and as such, City Council should be given the opportunity to understand the proposed project changes. Therefore, city staff will request that the 2040 Plan definition remain consistent with the definition in the CAMPO 2035 Plan (one express lane in each direction) until an agreement can be reached with the jurisdictions in which the proposed project is located.
- **SH 45 SW, Loop 1 S to FM 1626, Road Project ID: 114, Sponsor: CTRMA/TxDOT, page 168**
Described as a four-lane tolled freeway with a 2015 Let Year, which is the year that funding is available for a project. This is the Committed, controversial SH 45 SW that was recently cleared by TxDOT to proceed into final design and construction. This project is in direct conflict with *Imagine Austin*, which states under Action LUT A46, "Ensure consistency between the Growth Concept Map Series and regional transportation plans by amending the Austin Metropolitan Area Transportation Plan to remove SH45 SW and requesting its removal from the Capital Area Metropolitan Planning Organization 2035 Regional Transportation Plan."
- **SH 45 SW-E, FM 1626 to IH 35 S, Road Project ID: 115, Sponsor: Hays County/Buda, page 168**
This project is described as the environmental and preliminary engineering analysis for SH 45 SW, from FM 1626 to IH 35. This piece would complete SH 45 SW from IH 35 and Loop 1 S, and falls within the City of Austin's extraterritorial jurisdiction (ETJ). This is inconsistent with *Imagine Austin*, as noted above, and the City is on record in opposition to SH 45 SW in this area.
- **Garlic Creek Dr., SH 45 SW to RM 967, Road Project ID: 301, Sponsor: Buda, page 178**
This project is described as a new, four-lane divided roadway that would be 100% Locally Funded, with a 2025 Let Year. While only a small portion falls within the City's ETJ, this project would provide a new north/south thoroughfare that would connect to SH 45 SW between FM 1626 and IH 35 (Road Project ID 115), which is inconsistent with policy noted in *Imagine Austin*.

- **Proposed elevated Toll Road, RM 620 South of 2222 to SH 45 S, Illustrative List, Sponsor: Lakeway, page 205**, The proposed project is similar to the 1984 “SH 45 Western Outer Loop”, and is a study in the Illustrative List for a six-lane, elevated toll road. Any new roadway would traverse through the City’s full-purpose jurisdiction and ETJ, require a new western bridge over Lake Austin, and cross City of Austin Water Quality Protection Lands (WQPL) and areas designated in the Balcones Canyonlands Conservation Plan (BCCP). This project also has significant federal permit implications and could severely impact environmentally sensitive areas and protected species. While the Austin Transportation Department (ATD) is on record for objecting to this project, the City of Austin’s Watershed Protection Department and Austin Water Utility would also like to emphasize that they too do not support this project due to environmental issues and constraints. *Map 1* demonstrates the project is contrary to *Imagine Austin* and City staff will request that it not be considered for further study. Austin Transportation Department (ATD) staff requests that alternative, existing roadways be considered for further study to address the mobility concerns of this area (e.g. Loop 360, RM 620, RM 2222, and SH 71).
- **NF 13, RM 1826 to FM 150, Illustrative List, Sponsor: Hays County, page 208**
This project replaced what would have been the Escarpment extension to connect SH 45, west of Loop 1 S, to FM 150 in Hays County. This project is presently described as a **new**, two-lane undivided, major arterial, which would provide a north/south connection between RM 1826 to FM 150. While much of the proposed project falls outside of City of Austin jurisdiction, it would traverse through the City’s Water Quality Protection Lands and/or Conservation Easements that are protected in perpetuity, thus negatively impacting the City of Austin. City staff has pointed this out on multiple occasions and continues to request that this project be removed.

In addition to the specific projects outlined above, several roadway projects in the Road Project list will likely impact City of Austin Water Quality Protection Lands, either Fee Simple or Conservation Easements. The apparent expansion of these **existing roadways**, which would require additional right-of-way (ROW), appears to encroach upon the protected lands. Any expansion of the ROWs of these segments that result in a taking of City land is anticipated to require condemnation and a change in use triggering a Chapter 26 hearing (Chapter 26 of the Texas Parks and Wildlife Code). In some cases these lands also have a Federal nexus, which is a partnership that was formed with the Federal government to preserve these lands. The following problem projects are:

- Road Project ID 146, FM 150 W, RM 12 to FM 1826
- Road Project ID 148, FM 150 W, FM 3237 to Kyle Loop SW
- Road Project ID 159, FM 967, FM 1826 to FM 1626
- Road Project ID 188, FM 3238, RM 12 to SH 71 W
- Road Project ID 207, RM 1826, Slaughter Lane to SH 45 SW
- Road Project ID 294, Fitzhugh, US 290 W to County Line

In general, City of Austin staff would also like to secure its investments in protecting environmentally-sensitive lands. Roadway projects that encroach on City, protected lands are a major concern. Superior

environmental protection for sensitive waterbodies and the Barton Springs segment of the Edwards Aquifer (BSEA) is highly desired. In addition, coordination with local governments to understand documented flooding problems could improve future planning efforts in the alignment of projects.

Policies

City staff will request that policies in the CAMPO 2040 Plan remain consistent with *Imagine Austin* and provide for a transportation system that accommodates the mobility of all ages and abilities. City staff will continue to voice concern in regard to the following CAMPO 2040 Plan policies.

**Please note - A table that compares policy wording changes between the CAMPO 2035 Plan and the CAMPO 2040 Plan is provided at the end of this summary for your reference to understand the policy concerns presented below.*

- **Centers Policies**

Policy 1 concerns the 50% target of CAMPO Surface Transportation Program – Metropolitan Mobility (STP-MM) federal funds to support development of the mixed-use activity centers included in the CAMPO Centers Map. **Policy 16** is related, but more generally states that the region supports the development of high density, mixed-use activity centers in the locations shown on the CAMPO Centers Map.

City staff will request that **Policy 1** remain consistent with the adopted CAMPO 2035 Plan language (*see table below), given that *Imagine Austin's* growth concept map is based on the concept of mixed-use activity centers. In past STP-MM Call for Project applications, eligibility requirements assured that funding was available primarily to multimodal and connectivity projects that supported mixed-use, walkable development (versus allowing funding to be spent on general purpose, added capacity highway projects or arterial expansions that do not directly support the development of people-oriented places). City staff will request that this practice continues.

Policy 16 (*see table below) has been modified since the CAMPO 2035 Plan to be more general. It has lost its specificity that provided a reasonable performance target for Centers in terms of accommodation of employment and population. City staff will request that this policy be modified to language that is more in keeping with Policy 26 from the CAMPO 2035 Plan (*see *table below).

- **Pedestrian Bicycle and Policies**

Policy 2 concerns a 15% target of CAMPO discretionary federal funding (STP-MM) to pedestrian and bicycle projects. This was changed from the CAMPO 2035 Plan Policy 4 (*see table below), which specified a firm, 15% set-aside of STP-MM funding to pedestrian and bicycle projects, using a previously adopted Priority Pedestrian Districts Map and Priority Regional Bicycle Corridors Map. City staff believes that funds should continue to be dedicated to areas where pedestrian and bicycle funding could significantly improve traveler safety (represented in the

Pedestrian and Bicycle Districts). Staff will request ongoing support of a dedicated funding stream, as in the 2035 Plan.

- **Policy 12** concerns the accommodation of pedestrian facilities and differs substantially from the previously adopted CAMPO 2035 Plan Policy 19 (*see table below), which required pedestrian facilities in Near Term Pedestrian Districts unless it was not feasible based on a waiver review. The CAMPO 2040 Plan Policy 12 merely “encourages” facilities with new construction, and “considers” pedestrian facility needs in the context of “local government and long-term community goals”. This does not assure that pedestrian safety issues will continue to be a focus of the region and is not consistent with Federal Highway Administration (FHWA) best practice recommendations related to routine accommodation policy language (see http://www.fhwa.dot.gov/environment/bicycle_pedestrian/guidance/design_guidance/design.cfm). City staff will request that a stronger Policy 12, similar to the previously adopted CAMPO 2035 Plan Policy 19, which follows FHWA best practice.
- **Policy 13**, similar to Policy 12, concerns the accommodation of bicycle facilities and differs substantially from the previously adopted CAMPO 2035 Plan Policy 20 (*see table below), which required bicycle facilities in High and Medium Priority Bicycle Corridors unless the cost was excessive. The CAMPO 2040 Plan Policy 13 merely “encourages” bicycle facilities with new construction, and “considers” bicycle facility needs in the context of “local government and long-term community goals”. This does not assure that bicycle safety issues will continue to be a focus of the region and is not consistent with Federal Highway Administration (FHWA) best practice recommendations related to routine accommodation policy language (see http://www.fhwa.dot.gov/environment/bicycle_pedestrian/guidance/design_guidance/design.cfm). City staff will request that a stronger Policy 13, similar to the previously adopted CAMPO 2035 Plan Policy 20, which follows FHWA best practice.

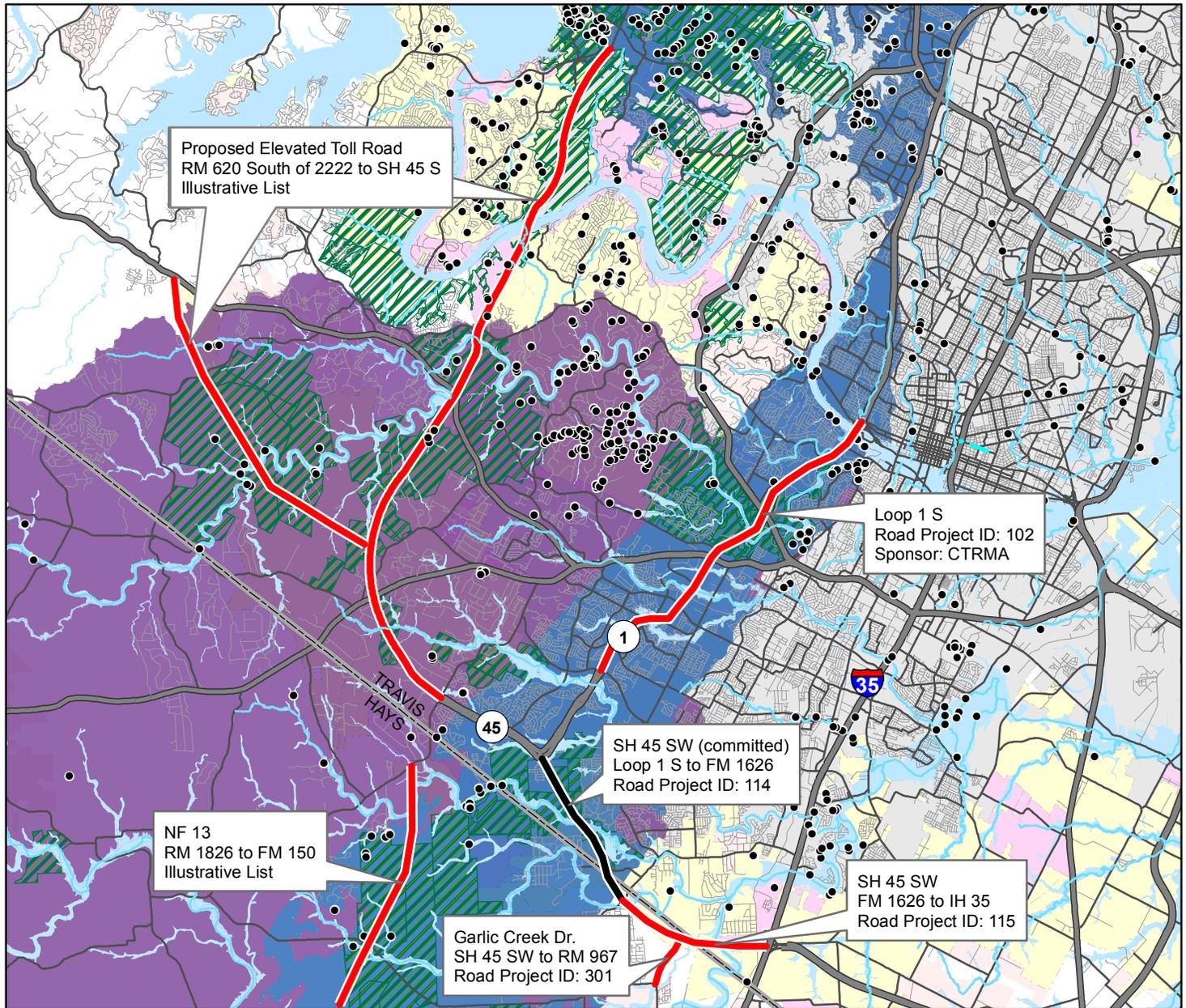
***The Table below compares wording changes between certain policies from the CAMPO 2035 Plan and the CAMPO 2040 Plan. This is provided for your reference to understand the policy concerns presented above.**

Staff Recommends adherence to the 2035 Plan Language (below) in lieu of the 2040 Plan language proposed to the right.			
2035 Plan Policy Language		2040 Plan Policy Language	
Policy 3	Target 50 percent of available CAMPO discretionary federal funding (STP-MM) to support development of the mixed use activity centers indicated on the CAMPO Centers Map. (The same project may address both the 15% bicycle and pedestrian set aside and the 50% Centers set aside policies.)	Policy 1	Target 50 percent of available CAMPO discretionary federal funding (STP-MM) to support development of the mixed-use activity centers indicated on the CAMPO Centers Map. (The same project may address both the 15% bicycle and pedestrian, and the 50% Centers target policies.) <i>Note – 2040 Plan language the same as 2035 Plan language; providing for reference only.</i>
Policy 4	Allocate at least 15 percent of available CAMPO discretionary federal funding (STPMM) to bicycle and pedestrian projects through the CAMPO TIP process, using the Priority Pedestrian Districts Map and Priority Regional Bicycle Corridors Map in the project evaluation. (The same project may address both the 15% bicycle and pedestrian set aside and the 50% Centers set aside policies.)	Policy 2	Target 15 percent of available CAMPO discretionary federal funding (STP-MM) to bicycle and pedestrian projects through the CAMPO TIP process. (The same project may address both the 15% bicycle and pedestrian, and the 50% Centers target policies.)
Policy 19	Provide pedestrian facilities with all new construction and reconstruction of regionally significant roadways and bridges shown on the Priority Pedestrian Districts Map as “high” or “medium priority “near-term” or “long-term” districts in alignment with the project open date, unless the jurisdiction constructing the roadway has demonstrated that the providing the pedestrian facility is not feasible due to excessive cost been granted a waiver in accordance with the CAMPO Pedestrian Waiver Procedure. “Near-Term” Districts – Projects opening in 2013 and beyond “Long-Term” Districts – Projects opening in 2026 and beyond. (Projects in the Long-Term Districts opening prior to 2026 are required to complete pedestrian facility design and preserve right-of-way for later construction.)	Policy 12	Encourage implementation of pedestrian facilities with new construction and major rehabilitation of regionally significant roadways at the major arterial functional classification or higher. Consideration of the need for such facilities and their implementation should be considered in the context of local government needs and long-term community goals.

Staff Recommends adherence to the 2035 Plan Language (below) in lieu of the 2040 Plan language proposed to the right.			
2035 Plan Policy Language		2040 Plan Policy Language	
Policy 20	Provide bicycle facilities with all new construction and reconstruction of regionally significant roadways and bridges shown on the Priority Bicycle Corridors Map as “high” or “medium priority unless the jurisdiction constructing the roadway has demonstrated that the providing the bicycle facility is not feasible due to excessive cost.	Policy 13	Encourage implementation of bicycle facilities with new construction and major rehabilitation of regionally significant roadways at the major arterial functional classification or higher. Consideration of the need for such facilities and their implementation should be considered in the context of local government needs and long-term community goals.
Policy 26	Support development of high density, mixed use activity centers in the locations shown on the CAMPO Centers map, and work with local jurisdictions and others to accommodate 31% of regional population and 38% of regional jobs in activity centers shown on the CAMPO Centers map by 2035. CAMPO will support achievement of the goals through activities such as: monitoring and reporting on growth and investment in the Centers, dissemination of best practices and tools, planning support, and funding for transportation investments. As appropriate, member jurisdictions will support development of centers through local planning and other methods.	Policy 16	Support development of high density, mixed-use activity Centers in the locations shown on the CAMPO Centers map.

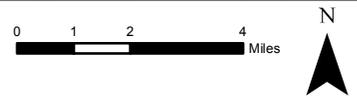
CAMPO 2040 Regional Transportation Plan Proposed Projects in Environmentally-Sensitive Areas

Map 1



Legend

- Springs
- Creek Centerlines
- Greater Austin FEMA Floodplain
- WQPL & BCP Boundaries
- Edwards Aquifer Recharge Zone
- Edwards Aquifer Contributing Zone
- 2 MILE ETJ
- 5 MILE ETJ
- Full Purpose City of Austin
- Limited Purpose
- Other City Limits



Date: 3/23/2015

This product is for informational purposes and may not have been prepared for or be suitable for legal, engineering, or surveying purposes. It does not represent an on-the-ground survey and represents only the approximate relative location of property boundaries.

This product has been produced by Austin Transportation Department for the sole purpose of geographic reference. No warranty is made by the City of Austin regarding specific accuracy or completeness.



City of Austin

Submittal Review Comments

Project Title: CAMPO 2040 Plan

Reviewers:

ATD = Austin Transportation Department

AWU = Austin Water Utility

PDRD = Planning & Development Review Department

PWD = Public Works Department

WPD = Watershed Protection Department

Report: CAMPO 2040 Plan (March 2015)

Date: 3/31/2015

REVIEW COMMENTS AND RESPONSES

No.	Reviewer	Chapter	Page	Topic	Review Comments:
1	WPD	Contents	3	Benchmarking	Although it is not currently in the CAMPO Plan, we suggest that the agency consider comparisons to areas of rapid growth and limited funding such as in California (both in size, diversifying population and future needs). This benchmarking would identify lessons learned, best practices, and mistakes to avoid. There is no need to "reinvent the wheel" if there are other plans that have addressed the transportation issues CAMPO is grappling with. The agency could possibly identify a similar city and try to duplicate (good outcomes) or not duplicate (bad outcomes) in similar planning efforts.
2	WPD	List of Maps	6	Maps	Please make available the GISST and GIS layers associated with the plan. This should include the necessary attribute information and geometry of each projected road project in order for reviewers and participating agencies to geolocate with their own resource and project planning GIS. This is especially important as projects progress through the environmental review phase. It will help participating agencies be ready to identify preliminary issues/concerns or if there are none be able to communicate that ahead of time to CAMPO, TxDOT, and CTRMA as well as with each other. Making such available on the website or through FTP downloads would solve many of the problems with the maps in the document.
3	ATD		25	Guiding Principles	Sustainability and Affordability should be included as additional guiding principles
4	ATD	1	26	Growing Population	Table 1 & Figure 2: include sources - Census and SDC
5	ATD	1	27	"Blueprint for Future Investment"	Appendix G includes the Performance Measures, while Appendix I includes the Financial Forecast Addendum. However, page 27 refers to Appendix G for summarization of the revenue forecast figures presented in Figure 1.

No.	Reviewer	Chapter	Page	Topic	Review Comments:
6	ATD	1	29	Performance Measures	The goals for "system preservation" and "project delays" do not have any performance measures associated with them in the matrix. Suggest adding some for the next update.
7	ATD	1	31	Allocating Future Growth	More technical details needed about how the DAT works, perhaps in the appendix
8	ATD	2	46	Map 5	Review roadway network to make sure there are no missing segments, eg I-35 has a lot of missing segments, ID415 is missing, ID262 is missing, ID263,
9	ATD	2	47	Our Regional Mobility Needs	Need to mention the desire / need to operate/manage the transportation system as "One" system instead of multiple systems e.g. TXDOT system, City of Austin System, Capital Metro System. Establish regional Transportation Management Center to achieve "One System"
10	ATD	2	47	Our Regional Mobility Needs	The following sentence in the 2nd paragraph seems to state the obvious: "Forecasts indicate that by 2040, most of the anticipated growth will be from people moving to the region." It seems the only other alternative would be if some existing residents move to a new residence while other remain at the existing residence. This would increase the number of occupied residences but not necessarily the population. People moving within the region would not increase either the population or the number of occupied residences.
11	ATD	2	47	Our Regional Mobility Needs	The 1st and third sentences in the 5th paragraph state that roads move people and freight. Roads do not move people and freight, but they provide the ability for people and freight to move (or be moved). Revise the first sentence of the fifth paragraph as follows: "Roads are essential to the region's transportation system, providing for the movement of people and freight within and through the region." Revise the third sentence as follows: "The primary function of highways and other limited access roads is mobility; these roads provide for the movement of people and freight for longer distances, while providing limited local access."
12	ATD	2	48	Map 5	Confirm the road network matches AMATP
13	ATD	2	49	Map 6	MoPac is shown as a tolled roadway type. The portion of MoPac north of Scofield Ridge Parkway has all "main lanes" tolled. Should the portion of MoPac that will have a combination of some free main lanes and some tolled main lanes have a different code? If not, it would appear that all the main lanes are tolled.
14	ATD	2	49	Map 6	Confirm the road network matches AMATP
15	ATD	2	49	Map 6	Review roadway network to make sure there are no missing segments and reflects preferred scenario, eg I-35 and SH 45 SW-E (Design Only)
16	ATD	2	50	Congestion	Congestion is not solely caused by lack of supply

No.	Reviewer	Chapter	Page	Topic	Review Comments:
17	PDRD	2	53	Transit	Map 10, Public Transportation Service Area shows portions of the Austin urbanized area as being within CARTS service area (i.e. Cedar Park and Pflugerville). Our understanding is that these areas do not receive CARTS's service, but would need to negotiate for service through an out of area service agreement or other mechanism. Indicate the census-defined Austin urbanized area on Map 10.
18	ATD	2	54	IH-35	Revise the first full paragraph in the center column to have two separate sentences as follows: "Congestion is not the only concern. The accident rate on IH 35 in the CAMPO region is higher than the state average."
19	ATD	2	54	Active Transportation	Suggest replacing photo of Pedicab with a protected facility to reflect new strategy in creating an All Ages and Abilities Bicycle Network. Suggested caption, "The City of Austin's Bicycle Master Plan focuses on creating a complete network that serves people of all ages and abilities with protected facilities like this one on Barton Springs Road." Suggest using photo of Barton Springs Road cycle track. See attached. High resolution photo available from the Active Transportation Program at ATD.
20	ATD	2	55	Transit	Map 10 title should match previous section title (ie, "Regional Transit Providers").
21	ATD	2	55	Transit	Map 10 and others should more clearly delineate/differentiate CAMPO region from other counties. Could make non-CAMPO county names smaller, less bold, for instance.
22	ATD	2	56	Transit	Suggest separating out freight rail since it's not transit. Put in own sentence like, "In addition to providing passenger service on its 32-mile Red Line, Capital Metro also operates freight service along that same corridor during off hours, as it is part of their 163-mile shortline freight railroad."
23	ATD	2	56	Transit	Rural Transit: Suggest starting with all of the RT services provided by CARTS, then describe each one; instead of "also provides..." then "additional connections..." and "as well as..."
24	ATD	2	56	Transit	If CAMPO considers pedi-cabs transit, then include in discussions above; otherwise, find a different picture or change the caption to note that while they're popular, they're not transit.
25	ATD	2	57	Transit	University Transit: Section a little confusing since UT Shuttle noted above in Urban Transit. Suggest tying two together (reference this section in above, etc).
26	ATD	2	59	Map 11	City of Austin has updated its network since 2012. It is possible to include more recent data?
27	PWD	2	59	Bicycle Facilities	This map does not seem correct. For example, the CTRMA has built Shared Use Paths on all of its expressways (US 183A and Manor Expressway for example). These facilities are not shown on the map.
28	ATD	2	60	Map 12	City of Austin has updated its network since 2012. It is possible to include more recent data?
29	ATD	2	64	Alternative Scenarios	There is no reference to Figure 11 specifically in the text.

No.	Reviewer	Chapter	Page	Topic	Review Comments:
30	ATD	2	64	Forecasting Future Travel	Too simplistic discussion. Use "travel demand model" separately from "modeling process". Model is more than a series of equations. May want to note that it's complex and proprietary software used under license, etc.
31	ATD	2	64	Evaluating Alternative Scenarios	Discussion of "Future Scenarios" shouldn't talk about "improve conditions now..."
32	ATD	2	66	Evaluating Alternative Scenarios	Needs be more clear that CAMPO used a single demographic projection and a single land use projection with multiple project scenarios. If this isn't the case, then state it more clearly.
33	ATD	2	66	Comparing Scenarios	Needs discussion of why run 2020. Comes out of nowhere and not a scenario. Confusing that E+C run with 2020 for benchmark, when 2040 seems more appropriate.
34	ATD	2	66	Table 10	Change title of middle column to "Types of Projects" or similar; otherwise, caption refers to projects but none of the columns refer to projects.
35	ATD	2	66	Table 10	Suggest revising title of Col 3 so that "preferred scenario" isn't repeated for each PL.
36	ATD	2	67	Performance Measures	More analytical discussion is needed for the reader to understand the significance of the different performance measure results provided in Appendix G.
37	ATD	2	67	Comparing Scenarios	Modeling Results: Rewrite first sentence -- need to acknowledge that result is 'as would be expected'
38	ATD	2	68	Comparing Scenarios	Modeling Results: Isn't mode shift a behavioral change? Aren't other TDM outcomes, like teleworking and timeshifting behavioral? This was modeled for Austin Chamber using CAMPO TDM. A scenario with increased transit/bike/ped capacity would presumably see a shift in mode -- isn't that a prediction/forecast?
39	ATD	2	68	Preferred Scenario	Verify that \$4.85B doesn't include local funds too (seems like it should). If doesn't, than use the project value, not the state and fed funds only.
40	ATD	2	68	Preferred Scenario	Suggest delete or replace "given financial constraints" with "assumed..." or "current..." or "existing...". The constraints are definitely not a "given".
41	WPD	3	76	Maps	Map 14 and associated county maps in Appendix E - The map would be much more useful if the various projects were labeled with the project ID. It may not be possible to do this on Map 14, but should be done for the more detailed maps in Appendix E.
42	WPD	3	76	Maps	Map 14 and associated county maps in Appendix E - These maps do not show projects for the plan years from the present to 2019. If not shown on these maps, these projects should be shown on a separate set of maps.

No.	Reviewer	Chapter	Page	Topic	Review Comments:
43	ATD	3	77	Transit	Need better definition of HCT: "move more people than a typical bus." This doesn't even acknowledge greater carrying capacity of vehicles, themselves. PC definition is: <ul style="list-style-type: none"> • Has one or both of the following: <ul style="list-style-type: none"> • Dedicated lane/right-of way for at least a portion • Transit priority • Fewer stops, higher speeds, more frequent service, carries more people • Congestion Resistant/Proof
44	ATD	3	77	Transit	LSRD should be included in CMTA and COA sentence.
45	ATD	3	77	Transit	Project Connect: PC is both a system plan and a partnership between three agencies. Project Connect partners worked with the TWG to develop the system plan.
46	ATD	3	77	Transit	LSRD: Should include description of LSTAR project and note that EIS for Lone Star Regional Rail Project is underway.
47	ATD	3	77	Active Transportation	Suggest replacing photo of Pedicab with a buffered bike lane to show what an Ages and Abilities Bicycle Network looks like. Suggested caption, "Careful allocation of space on a roadway can maintain capacity while also providing high-comfort facilities like this buffered bicycle lane on Pedernales Street." High resolution photo available from the Active Transportation Program at ATD.
48	PWD	3	80	Active Transportation	Include, "In coordination with the 2014 Bicycle Master Plan, the City of Austin also passed an Urban Trails Master Plan that plans to construct a 90-mile separated transportation and recreational trail network that will connect to on-street bikeways and sidewalks. The overall on-street and off-street network will provide citizens and visitors of all ages and abilities access to the active transportation network."
49	ATD	3	86	Innovative Intersections	TxDOT is constructing continuous-flow intersections at the Y at Oak Hill
50	ATD	3	90	Land Use	Change to "Development Patterns" as this is where industry is headed for terminology. This needs more attention/emphasis. Discuss CAMPO Centers, include pic of Imagine Austin, etc.
51	ATD	3	94	Congestion mitigation	"Congestion Mitigation" discussion should include the Preferred Scenario, since your modeling shows that doesn't reduce or eliminate congestion. Don't minimize these other strategies given that we need them all. And, Land Use should be in here too (though, we're moving towards "Development Patterns" instead)
52	ATD	3	95	Transit	ACC also locates its facilities/campuses along transit lines
53	ATD	3	98	Land Use	Suggest changing Land Use to Development Patterns
54	WPD	3	99	Centers	Although reference is made to coordination with jurisdictional partners, a review and comparison of the CAMPO centers with the Imagine Austin Comprehensive Plan should be made. Overlays of planned centers in both plans should be looked at for similarities and differences. This also can be done through GIS coverages.

No.	Reviewer	Chapter	Page	Topic	Review Comments:
55	WPD	3	100	Compact and Connected	The discussion on land use/development patterns is primarily geared to moving people from one place to another. However, no mention is made of Compact and Connected, but the concepts are mentioned through Envision Central Texas and in looking at the Centers approach to development. High density development and high capacity transportation are also found in the Imagine Austin and the Austin Strategic Mobility Plan. High density development and high capacity transportation are mentioned in several places. More information on the place of Compact and Connected can be found in Imagine Austin: https://austintexas.gov/page/compact
56	WPD	3	102	Centers Implementation	Please make some comparison between Travis County Land Water and Transportation Plan and COA plans (Watershed Protection Ordinance, Imagin Austin, Compact and Connected). CAMPO 2040 is an important place to coordinate planning and regulatory efforts of all partners and jurisdictions that are affected, This is true of those portions of the plans and ordinances that are not primarily transportation related (i.e. water quality, flooding, and erosion control among others).
57	ATD	3	107	Complete Streets	Thank you for the opportunity to review the draft CAMPO 2040 plan language on Complete Streets. It's great to see it included. In addition, I would recommend that all sections of the Plan that address transit, bicycle, and pedestrian facilities add one sentence to the effect that "Including these facilities is consistent with a Complete Streets approach, as recommended by US DOT and FHWA."
58	ATD	3	107	Complete Streets	Rather than referencing only Austin's policy, I would recommend that CAMPO 2040 add language that references US DOT policy and guidance for Complete Streets. These federal policies are directly relevant to all roadway projects that receive federal funding through an MPO, so it would be helpful to have our plan reference and link to them.
59	ATD	14	111	Pavement Maintenance, Rehabilitation, and Reconstruction	Need discussion of non-TXDOT roadways. Need discussion of what funding levels are needed to achieve the designed roadway condition score.
60	WPD	4	113	Bridge Maintenance	If possible, provide a prioritized list or map of bridge scheduled for rehabilitation or replacement within the planning timeframe (Also applies to the third group item in Table 34).
61	ATD	4	116	Safety	Fig. 20: text for Fig 20 indicates years 2003 – 2010 when the figure shows 2010 – 2013

No.	Reviewer	Chapter	Page	Topic	Review Comments:
62	ATD	4	122-128	Security	The section on Security on pages 122 thru 128 of the CAMPO 2040 Plan mentions Emergency Response Coordination, it makes little mention of damage that could be caused to the roadway infrastructure including bridges and overpasses, by terrorist incidents, including damage caused by attack or sabotage. The nature of a terrorist attack is sudden and unexpected. In reality, no road transportation system can claim to be 100% secure 100% of the time because there is just no such thing. Statistically speaking, the probability of occurrence of terrorism on our road transportation system is much lower than traffic collisions and vandalism. However, the impact of occurrence of terrorism is much greater than accidents of vandalism. Maybe a paragraph stating the foregoing might be sufficient.
63	WPD	4	122	Table 20 - Environmental Factors	Although this table does an excellent job of summarizing these factors, additional environmentally superior strategies above the lowest common denominator should be referenced from other sources. For example, aquifer protection through the Edwards Aquifer Rules is inadequate in the Barton Springs Zone. As indicated in the public comment Environmental Impact Statement for the SH 45 SW project, sufficient doubt exists that aquifer protection can be made provided even going beyond the Edwards Aquifer Rules.
64	WPD	4	122	Table 20 - Environmental Factors	Another primary consideration mentioned only briefly in this table was federal and state endangered species protection and their connected USFWS 10a permit requirements. This is a major issue for some of the projects and will require much more than the status quo in terms for water quality and habitat protection. The only strategies listed for protection of these ecological resources concerns land preservation and alignment design for avoidance and minimization of impacts.. Reference should be made to strategies
65	WPD	4	123	Flooding	Flooding is mentioned in pages 123-125 but mostly in relation to reasons of "rainfall intensity, ground saturation, and presence of debris" blocking drainage facilities. It is also important to mention that impervious cover contributes to run-off and therefore exacerbates flooding conditions without considering increasing impervious cover in drainage design of roadways. The earlier plans are made for flood control, the more efficient they will be over the course of transportation development in the next 25 years.
66	WPD	4	123	Flooding	Although there is a section on flooding of roads and low-water crossings, there is no discussion of the potential impacts of new/expanded roads to exacerbate localized and creek flooding and stream erosion, and to degrade water quality.
67	WPD	4	124	Flooding	This section mentions local and county jurisdictions that participate in low-water crossings and road closures, but does not mention TxDOT. TxDOT participation would result in more comprehensive coverage and warnings.

No.	Reviewer	Chapter	Page	Topic	Review Comments:
68	Office of Sustainability	4	126	Wildfire Evacuation	I see a Hurricane Evacuation Routes on page 126 but don't see a map for wildfire evacuation routes. I know that the wildfire evacuation routes have yet to be confirmed but it might be important to either state that this is in the works or provide a draft map for now. Please contact Justice Jones (AFD) for more information.
69	WPD	4	131	Environmental and Historic Resource Protection	We recommend that CAMPO improve the discussion of "Environmental and Historic Resource Protection": In the introduction to this section, the concept of "environmental superiority" should be introduced, and various elements of the Imagine Austin Comprehensive Plan can be offered as "proof" of the community's commitment to environmental superiority. A partial list of priority actions can be found in the Green Infrastructure Priority Program on p. 197 of the Imagine Austin plan: http://www.austintexas.gov/sites/default/files/files/Planning/ImagineAustin/webiacpreduced.pdf . For example, Imagine Austin speaks to preserving environmentally sensitive areas, greater creek protection, riparian restoration, etc. In this context, "Environmental
70	WPD	4	132	Access	In Table 20 (pp 132-133) there should be some mention of impervious cover, land development and the idea of access. If roads are built and provide access to areas, then people will build there over time (such as Southwest Parkway and MoPac South). Encouraging the upgrading and reconstruction of current roads can provide reinvestment in areas already built, and reduce the amount of impervious cover overall. It is recommended that GIS analyses be incorporated into environmental documents (Environmental Assessments and Environmental Impact Statements) that examine impervious cover increases as roads are either upgraded or developed and what that means regarding future land use. Currently, only a cursory examination is made.
71	WPD	4	132	Water Quality Potential Strategies	Add to Table 2 "Incorporate independent environmental review during design and construction of projects, often called "environmental commissioning", in projects over the Edwards Aquifer Recharge Zone and Contributing Zone."
72	WPD	4	132	Water Quality Potential Strategies	Add bullet to Table 2 "Use best available technology and design for permanent and temporary water quality controls for all road projects."
73	WPD	4	132	Ecological Potential Strategies	Add to Table 2 "Avoid locating or expanding transportation facilities within or near sensitive environmental areas, including the Edwards Aquifer Recharge Zone, Balcones Canyonlands Preserve properties or protected caves, City of Austin Water Quality Protection Lands, and habitat or surface water drainage areas of endangered or threatened species."
74	WPD	4	136	Maps	Map 29 and associated county maps in Appendix E - The map would be much more instructive if the planned roadway projects were shown (similarly for maps 27, 28 and 30).

No.	Reviewer	Chapter	Page	Topic	Review Comments:
75	WPD	4	140	Water Issues	This section on water issues is limited. CAMPO could commit to implementing the plan using best practices in terms of water conservation and water quality measures as parts of the planned projects. Roadway projects can provide innovative solutions regarding infiltration and can be built so that they don't interfere with riparian systems and recharge zones. More research and planning how and where these methods are appropriate should be added to this section of the 2040 plan.
76	WPD	4	141	Climate Change	pp 141-145: Roadway structures by nature (culverts, curbs, the roadway itself) prevent infiltration and flow of water compared to predeveloped conditions. The discussion of climate change may want to reflect on the fact that the roadway network is a direct contributor to these events.
77	Office of Sustainability	4	143	Extreme Weather	Would Table 21 have more impact if we added a column on the right which indication the increase in chance the threshold will be reached? For example, several thresholds are Temperature > 100°F. The next column would say, Climate projections: Increase of 34 more days per year with temperatures over 100° F. That way, folks can see that there is an increased risk that assets will be negatively impacted.
78	Office of Sustainability	4	144	Critical Assets	It's hard to tell, from the map, which intersections were studied. Would it help to list which roads/intersections were studied?
79	Office of Sustainability	4	145	Transportation Resiliency	Under next steps (end of page 145), we might want to add the need for more research on climate impacts and more collaboration between local and regional partners.
80	WPD	4	146	Environmental Justice	pp. 146-156: There is room for improvement not just on the marginalization of at-risk populations regarding access to decision making but also in terms of environmental quality (air, water, urban heat island) that can be shaped and modified by transportation networks and the access to food, parks, and education.
81	ATD	4	157	Emerging Technologies	Add section under Connected and Autonomous Vehicles referencing data exchange from system to vehicles. Auto manufactures have begun using this type of information to
82	ATD	4	157	Emerging Technologies	Heads up displays in vehicles to relay information from the signal system to drivers should be mentioned in this section
83	WPD	5	163	Action Plan	Introductory pages to the "Action Plan" do not mention protection of environmental / natural resources other than air quality. This should at least be recognized as one of many priorities that need to be balanced with mobility issues "to shape our transportation future".
84	ATD	5	164	Complete Streets	"Foster an Equitable Transportation System" -- this is Complete Streets, suggest revising to "Support and Implement CS Policies and Programs"

No.	Reviewer	Chapter	Page	Topic	Review Comments:
85	WPD	5	165	Transportation Planning Process	Typically no monitoring of system performance is included in transportation projects for adverse effects to flooding, erosion, and water quality. This provides no feedback to regional goals or any of the steps in this planning process. Community standards and performance measures are not evaluated, and design and construction processes do not change as a result. We suggest that another process be proposed that addresses these issues from initial planning, alternatives development, environmental review, design, construction and operation. In short, CAMPO 2040 needs to incorporate an adaptive management system for environmental protection.
86	ATD	5	165	Project List	ID 173 and 174 have conflicting descriptions and let years, clarify either the limits of construction or order of construction of MAD-4 & MAD-6
87	WPD	5	166	Table 32	Several of the proposed projects, particularly the proposed expansion and extension of 620 to SH45 South (Illustrative Projects, pg. 205), are not consistent with CAMPO 2040 Policy 6 on impacts to sensitive areas, including the Edwards Aquifer Recharge and Contributing Zones.
88	WPD	5	166	Project ID 85	Structure flooding upstream of this crossing are near or within the 100-year floodplain. Consider including water quality and detention improvements if possible.
89	WPD	5	166	Project ID 87	Structure flooding upstream of this crossing are near or within the 100-year floodplain. Consider including water quality and detention improvements if possible.
90	AWU	5	166	Table 32	There are several projects that are likely to impact City of Austin Water Quality Protection Lands, either Fee Simple or Conservation Easements. The apparent ROW of these projects appears to encroach upon the protected lands. Any expansion of the ROWs of these segments that result in a taking of City land is anticipated to require condemnation and a change in use triggering a Chapter 26 hearing (Chapter 26 of the Texas Parks and Wildlife Code). In some cases these lands also have a Federal nexus.” The following problem projects are: 146 FM 150 W RM 12 – FM1826 148 FM150 W FM3237 – Kyle Loop SW 159 FM967 FM1826 – FM1626 1
91	WPD	5	167	Project ID 92	COA comments on indirect and cumulative impacts were provided 3/6/2015 in questionnaire for the Environmental Assessment. COA has also part of the Technical Workgroup for this project. COA comments included 1)location of planned projects that might influence the project at http://www.austintexas.gov/page/emerging-projects 2)general purpose lanes may encourage development to be more low density auto-oriented pattern than consistent with Imagine Austin, 3)recommendation to identify upgrades needed within the existing TxDOT ROW to get these done as part of the project

No.	Reviewer	Chapter	Page	Topic	Review Comments:
92	WPD	5	167	Project ID 93, 94	The FONSI for this project was issued March 6, 2015. Detailed comments were sent by COA and an attempt was made by the sponsor (TxDOT) to address these comments: However, most of the responses stated that major flooding, water quality and erosion concerns would be resolved in the Plan, Specification, and Estimates phase or in the Technical Provisions in the Design-Build contract. The Drainage Study for the project was not available with the EA but TxDOT is attempting to incorporate COA drainage issues prior to the final Design-Build contract. However, no formal mechanism exists to follow this project through these phases for local agencies to provide input. This is especially important in this project as many COA facilities, future drainage projects, and economic development plans are impacted by the roadway improvements. We suggest that local agencies like COA be provided with more follow-through input in design, construction, and operation phases to avoid conflicts. Although CAMPO 2040 is necessarily a high level planning document, it sets the stage for these later processes and should address them in more detail. This is only an example of the issue.
93	WPD	5	167	Project ID 101, 102	Loop 1: This project crosses Williamson Creek and the Kincheon and Sunset tributaries of Williamson Creek. Significant structure flooding occurs upstream and downstream of these crossings. Adverse impact should not occur as a result of this project. Additional detention could reduce flooding in this area.
94	ATD	5	167	Project ID: 102	Loop 1, Cesar Chavez to Slaughter, This differs from what was in the previous, CAMPO 2035 Regional Transportation Plan, which proposed the project as only one express lane in each direction. City staff has serious concerns about this project due to the environmental implications in this area, as well as the ability of northern roadways to accommodate the increase in traffic that would likely result due to the added capacity and new SH 45 SW connection.
95	WPD	5	168	Project ID 118, 119	These projects under construction have periodic needs for drainage modifications and adjustments to culverts and bridges. We would appreciate if CAMPO 2040 included a model review flowchart for design and construction phases that includes the continued participation of local agencies who have facilities and projects affected by transportation related flooding, erosion, and water quality.
96	ATD & PDRD	5	168	Project ID: 114	SH 45 SW, Loop 1 S to FM 1626, This project is in direct conflict with Imagine Austin, which states under Action LUT A46, "Ensure consistency between the Growth Concept Map Series and regional transportation plans by amending the Austin Metropolitan Area Transportation Plan to remove SH45 SW and requesting its removal from the Capital Area Metropolitan Planning Organization 2035 Regional Transportation Plan."

No.	Reviewer	Chapter	Page	Topic	Review Comments:
97	WPD	5	168	Project ID 115	Sponsor Hays/Buda - SH45 SW-E - FM 1626 - IH-35 S. Environmental and preliminary engineering analysis for a new freeway (Design only). This segment is show as the only locally funded project on Map 14 on page 76 of the plan. The extension of SH45 SW to I-35 should be removed from the CAMPO 2040 plan as it will increase the negative impacts of the recently approved SH45 SW and was not included in the environmental impact statement for the SH45 SW project. It would drastically change the indirect and cumulative effects addressed in the EIS and effectively nullify the Finding of No Significant Impact.
98	ATD & PDRD	5	168	Project ID: 115	This project is in direct conflict with Imagine Austin, which states under Action LUT A46, "Ensure consistency between the Growth Concept Map Series and regional transportation plans by amending the Austin Metropolitan Area Transportation Plan to remove SH45 SW and requesting its removal from the Capital Area Metropolitan Planning Organization 2035 Regional Transportation Plan."
99	WPD	5	173	Project ID 207	Structure flooding d/s of RM 1826/Slaughter Creek crossing and east of RM 1826 a Spruce Canyon Dr.
100	WPD	5	176	Project ID 258	S. Congress: Structure flooding upstream of this crossing are near or within the 100-year floodplain. Consider including water quality and detention improvements if possible.
101	ATD	5	178	Project ID: 301	This project would provide a new north/south thoroughfare in an environmentally-sensitive area, which would connect to SH 45 SW between FM 1626 and IH 35. This project would only be feasible with the construction of SH 45 SW from 1626 to IH 35, which is inconsistent with Imagine Austin
102	WPD	5	179	Project ID 325	Howard Ln: The combination of the road crossing and the railroad crossing of Trib 10 of Walnut Creek contribute to road flooding on McNeil Dr. Improvements to the drainage system at this intersection should be considered to reduce road flooding and reduce flooding of the railroad (Cap Metro line).

No.	Reviewer	Chapter	Page	Topic	Review Comments:
103	WPD	5	205	Illustrative Projects Table 35	Proposed Elevated Toll Road from RM 620 South of 2222 to SH 45 S - Sponsor Lakeway *Note: The City of Austin Transportation Department staff do not support roadway due to feasibility and environmental issues - 6-lane toll road with grade separated bike lanes. Several of the proposed projects, particularly the proposed expansion and extension of 620 to SH45 South (Illustrative Projects, pg. 205), are not consistent with CAMPO 2040 Policy 6 on impacts to sensitive areas, including the Edwards Aquifer Recharge and Contributing Zones. This project has significant federal permit implications and would severely impact environmentally sensitive areas and protected species. The project would also have severe impacts for the maintenance of Balcones Canyonland Preserve and City of Austin Water Quality Protection Lands. It also might be mentioned that Watershed Protection Department and Austin Water Utility do not support this project due to environmental issues and constraints. It should not be considered further as "illustrative" or other project definition in the plan.
104	WPD	5	205	Illustrative Projects Table 35	It appears that Illustrative projects such as these are mentioned nowhere else in the document but Table 35. Apparently they are also not shown on maps either in the document or appendices. Their purpose in the plan is not clear and it would help if more explanation was made as to why they are included other than the Table caption.
105	ATD	5	208	Illustrative List	City staff has pointed out on multiple occasions that this project would not be feasible, as it would traverse through the City's WQPL and/or Conservation Easements.
106	ATD	5	210	Corridor Studies	Table 36: One of the Corridor Studies listed under the City of Austin is shown to be "South Lamar Boulevard Center (Underway). The word "Center" should be "Corridor".
107	ATD	5	210	Corridor Studies	Table 36: The limits of the Riverside Drive Corridor Study are shown to be "IH-25 - SH 71". This should be "IH-35 - SH 71".
108	ATD	Appendix C	228	Bicycle and Pedestrian	Policy 2 was changed from the CAMPO 2035 Plan Policy 4, which specified a firm, 15% set-aside of STP-MM funding to bicycle and pedestrian projects, using a previously adopted Priority Pedestrian Districts Map and Priority Regional Bicycle Corridors Map. City staff recommends that a firm set-aside and similar specificity be added back to Policy 2, given that Imagine Austin advocates for a multi-modal transportation system and due to the City's adopted Complete Streets Policy.
109	PDRD	Appendix C	228	Centers	Need to ensure that Policy 1 50% Centers Set Aside of discretionary federal funding is available primarily to multimodal/connectivity projects that truly support mixed-use, walkable development. (Versus allowing funding to be spent on general purpose added capacity highway projects or arterial expansions, that don't directly support the development of people-oriented places.)
110	PDRD	Appendix C	228	Centers	A policy should be added back to the CAMPO Plan which provides a reasonable performance target for Centers in terms of accommodation of employment and population.

No.	Reviewer	Chapter	Page	Topic	Review Comments:
111	PDRD	Appendix C	229	Bicycle and Pedestrian	Policy 12 and Policy 13 need to be rewritten to require implementation of bicycle and pedestrian facilities with major road construction, and to provide a clear exception process for when these facilities would not be required. By reverting to the encouragement language that was in CAMPO Plans prior to 2005, these policies no longer comply with FHWA best practices recommendations related to routine accomodation policy language, and will do little to encourage additional bicycle and pedestrian accomodation in the region. See: http://www.fhwa.dot.gov/environment/bicycle_pedestrian/guidance/design_guidance/design.n.cfm
112	ATD	4	109 & 228	Financial Forecast	Spell out the acronym for TRENDS.
113	ATD	4	115-122	Safety	Access to crash data and crash analysis capabilities is a substantial impediment to improving safety. Ideally, all local transportation and emergency response agencies would use the same set of data and analysis tools to improve the consistency in our analyses. For City transportation engineering staff to access crash data for analyses, a manual request needs to be made to APD for data prior to August 2013. After this date, staff has electronic access to APD's Brazos crash database for queries. TxDOT uses the Crash Information Reporting System (CRIS). CAMPO has the C-SAT for more robust analyses (seems to show a lot of promise for how we should change our best practices to analyze crash data), but (this is my last understanding) the data lags in timeliness compared to Brazos and CRIS.
114	ATD	4	115-122	Safety	City of Austin is recommending the development of a Consolidated Mobility Safety Plan. Funding for the plan is being pursued through the City's FY16 budget development process. Although the City's 40+ safety initiatives demonstrate that transportation safety is a top priority within the City, they lack a framework that ties them together within the context of overarching goals and objectives and performance measures. The recommended plan would address these issues and other high priority areas: <ul style="list-style-type: none"> o Access to crash data and crash analysis capabilities and o Strategies to reduce impaired traveling in Austin.
115	ATD	2	56/57	Transit	Switch MetroBus pic with UT Shuttle pic and revise caption to "Capital MetroBus"
116	PDRD	3	96-100	Centers	Plan provides a definition of Centers that distinguishes between Regional Centers, Town Centers and Village Centers but map legend doesn't reference these distinctions. Modify Map 18 to distinguish between Regional Centers, Town Centers and Village Centers.

No.	Reviewer	Chapter	Page	Topic	Review Comments:
117	WPD			Table 20 - Environmental Factors	A factor in aquifer protection and water quality protection in general is the potential for improvement to existing stormwater controls. Many of the roadways to be expanded were constructed with inferior flood, water quality, and erosion controls by today's community and regulatory standards. An opportunity exists to reconstruct controls using current technology and rectify controls that have failed. This would require innovation and willingness of sponsors to design in terms of the resource to be protected rather than in terms of the least costly methods acceptable to regulators.
118	ATD	General		Maps	Suggest providing more focused maps as appendices to zoom in on certain areas of the CAMPO planning area. Hard to see detail in many of them (e.g. population & employment density maps on the denser areas. Hard to see change in population & employment at this scale.)
119	ATD	14		Traffic Signal Maintenance, Rehabilitation and Reconstruction	Need discussion of this topic.
120	ATD	14		Traffic Sign Maintenance, Rehabilitation and Reconstruction	Need discussion of this topic.
121	ATD	14		Bridge Maintenance, Rehabilitation, and Replacement	Provide table identifying structurally deficient bridges
122	ATD	All		Maps	need higher resolution maps in the final plan