

Non-Radioactive Hazardous Materials Route Designation Analysis

City of San Marcos, Texas

July 31, 2025

Introduction

The transport of hazardous materials through densely populated areas presents potential dangers and unintended consequences to a community. These dangers can pose significant risk unless the community is prepared for action. Limiting public exposure, planning proper emergency response, implementing containment methods, and organizing clean up after an unfortunate event involving hazardous materials is crucial to minimizing these risks.

In an effort to reduce the risk of exposure to hazardous materials resulting from a crash involving trucks carrying Non-radioactive Hazardous Materials (NRHM), the US Department of Transportation's Federal Highway Administration (FHWA) implemented regulations in 1985 that limit the through-routing movement of commercial vehicles carrying non-radioactive materials classified as hazardous, such as petrochemicals, gases, and corrosive substances, to designated highways or routes. The regulation requires each state to designate NRHM routes within their jurisdictions. In Texas, the Texas Department of Transportation (TXDOT) delegates the authority to complete the FHWA prescribed process of designating specific highways as NRHM routes to local municipalities who also have the legal authority to enforce the use of these routes through municipal ordinances.

Therefore, the City of San Marcos, Texas (City), proposes a NRHM route designation along Farm to Market (FM) 110 and Ranch Road (RR) 12 for all trucks carrying hazardous materials through its city limits (**Attachment 1**, **Figure 1**). The purpose of this report is to summarize the steps taken in consideration of this proposal and to justify the designation of the local NRHM route.

Hazardous Material Definition

Hazardous material means a substance or material that the Secretary of Transportation has determined can pose an unreasonable risk to health, safety, and property when transported in commerce, and has been designated as hazardous under Federal hazardous materials transportation law (49 Code of Federal Regulations [CFR], Subtitle III, Chapter 51, Section 5103) including an explosive, radioactive material, infectious substance, flammable, or combustible liquid, solid, or gas, toxic, oxidizing, or corrosive material, and compressed gas. The term includes hazardous substances, hazardous wastes, marine pollutants, elevated temperature materials, materials designated as hazardous in the Hazardous Materials Table (49 CFR, Subtitle B, Chpt. 1, Subchpt. A, Part 172.101, pages 132-300), and materials that meet the defining criteria for hazard classes and divisions in part (49 CFR, Subtitle B, Chpt. 1, Subchpt. A, Part 173.2). If these substances are released or misused, they can cause death, severe injury, long lasting health effects, or damage to structures and other properties as well as to the environment.

Hazardous materials sites are those sites required under Occupational Safety and Health Administration (OSHA) regulations to maintain material safety data sheets (MSDSs) for hazardous chemicals stored or used in the workplace and must submit a Tier II report to the Texas Department of Health and Human Services.

Background to Designation Proposal

The City is a founding partner in the Edwards Aquifer Habitat Conservation Plan (EAHCP), along with the Edwards Aquifer Authority, City of New Braunfels, San Antonio Water System, Guadalupe-Blanco River Authority, Texas State University, Texas Parks and Wildlife Department, and United States Fish and Wildlife Service. The EAHCP is a regional plan intended to provide assurance that suitable habitat for covered species (i.e., threatened and endangered species) will remain in both the San Marcos and Comal springs and river systems.

The minimization and mitigation measures of the EAHCP are "...designed to ensure that incidental take resulting from the Covered Activities will be minimized and mitigated to the maximum extent practicable and will not appreciably reduce the likelihood of the survival and recovery of covered species associated with the Edwards Aquifer and Comal and San Marcos springs and river systems." Implementation of the EAHCP began in 2013 and has been on-going, including various projects in the City. One of the remaining EAHCP commitments yet to be implemented is Habitat Protection Conservation Measure 5.3.4, which states the following:

"Hazardous materials transported by truck across the watershed of the San Marcos River and its tributaries presents the possibility of accidental spills or releases into the environment. The limited geographical distribution of the endangered species at San Marcos Springs could cause the species to be highly impacted by such a spill.

The City will coordinate with TXDOT to designate hazardous materials routes which minimize the potential for spills entering the San Marcos River. This effort will include legislation, if necessary, and additional signage."

The City and EAHCP staff-initiated contact with TXDOT in 2021, to begin the process of designating a hazardous materials route within the City limits.

Process

In establishing or revising a NRHM route, the FHWA process requires that the political subdivision (i.e., the City) must comply with both federal and state regulations for NRHM routing, including 49 CFR Part 397 and 49 CFR Part 171 (Federal) and 43 Texas Administrative Code (TAC), Sections 25.101-25.104 (State).

The following steps outline the process of establishing or revising an NRHM route:

Initial Contact. A political subdivision considering the establishment of an NRHM route
must contact the local TxDOT district office and any other political subdivisions within a 25mile radius of any point along the proposed route. The political subdivision must consult
with the district office and other affected political subdivisions during the process of
determining the best NRHM route. Coordination with the Texas Department of Public Safety
(DPS) and the local emergency planning council or committee is encouraged.

- 2. Route Analysis and Proposal. The political subdivision must develop a route proposal. The written proposal must address all the federal standards and factors listed in 49 CFR Section 397.71(b). The political subdivision must use the most current version of the United States Department of Transportation (USDOT) publication entitled Guidelines for Applying Criteria to Designate Routes for Transporting Hazardous Materials or an equivalent routing analysis tool to develop the route proposal. If an equivalent routing analysis tool is used, the political subdivision must include in its route proposal a written explanation of how the tool is equivalent to the USDOT standards. This report is intended to satisfy this step in the process of establishing an NRHM route.
- 3. **Local Public Hearing.** The political subdivision must hold at least one public hearing on the proposed NRHM routing designation. Public hearings may take the form of a city council or commissioners court meeting and must conform to all applicable state laws governing public meetings, including the Texas Open Meetings Act, Government Code, Chapter 551.
- 4. **Proposal Submission.** After performing the analysis and conducting a local public hearing, the political subdivision must submit eight copies of the NRHM route designation proposal and one original color map of the proposed NRHM route to Traffic Safety Division (TRF) of TXDOT for approval. The proposal must include:
 - documentation demonstrating compliance with 49 CFR Part 397, Subpart C and 43 TAC Section 25.103
 - a complete description of the proposed route, and
 - a signature of approval by an authorized official of the political subdivision, such as the mayor, city manager, county judge, or an equivalent level of authority.

If a proposed route extends beyond the proposing political subdivision's jurisdiction into an adjacent jurisdiction, then a city council resolution from the affected adjacent jurisdiction must be included with the routing proposal.

The proposal and map must be submitted to the TXDOT, Traffic Operations Division, 125 E. 11th Street, Austin, TX, 78701-2483.

5. Proposal Submission.

- TxDOT Public Hearing. TRF of TXDOT will provide the public with notice through publication in the Texas Register and a 30-day period in which to comment. TRF will also conduct a public hearing to receive additional comments on the proposed NRHM routing designation. TRF will publish a notice satisfying the criteria described in Step 3 above. The notice must be published in two newspapers of general circulation in the affected area. The public hearing must be held in Austin, Texas, and conducted before the TXDOT executive director or a designee of the executive director.
- **Coordination.** TRF provides copies of the proposed route designation for review and comment to the local TXDOT district office, the DPS headquarters office, and appropriate TXDOT division offices.

- **Resolution of Concerns.** In coordination with the local TXDOT district office, TRF contacts the political subdivision proposing the route to resolve any concerns or issues about the proposed route designation and subsequent proposal expressed at the public hearing or received as written comments.
- 6. Coordination with other States and Indian Tribes. At least 60 days prior to establishing the NRMH routing designation, TRF will provide written notice to the officials responsible for NRMH highway routing in all other affected states or Indian tribes. If no response is received within 60 days from the date of receipt of the notification of the proposed routing designation, the routing designation will be considered approved by the affected states or Indian tribes.

TRF will attempt to resolve any concerns or disagreements related to the proposed routing designation expressed by any consulted states or Indian tribes. If these concerns or disagreements are not resolved, TXDOT will petition the FHWA for resolution of the dispute in accordance with 49 CFR Section 397.75.

Authorization and Approval. If TXDOT determines that route designation has met all criteria for approval, TRF will submit the proposed NRHM routing designation to the TXDOT executive director for approval. Upon approval by the TXDOT executive director, TRF will notify the political subdivision in writing that the proposed routing designation is authorized and will issue appropriate notice to the FHWA and the Texas DPS.

- 7. Route Designation and Signing:
 - **Designation.** Upon receipt of a letter of approval from TXDOT, the political subdivision must designate the NRHM route by ordinance, resolution, rule, regulation, or other official order. The political subdivision must forward a copy of the order to TRF within 30 days of receipt of the letter of approval.
 - **Signing.** After passage of the order, the political subdivision must submit the proposed sign and installation locations of the NRHM route designation to the local TxDOT district office for approval. All signs must conform to the latest version of the *Texas Manual on Uniform Traffic Control Devices*.

The local TXDOT district office should submit the proposed signing schematic to TRF for review.

The political subdivision must coordinate sign installations with the local TXDOT district office prior to placement.

Route Analysis and Proposal

As mentioned in Process, Step #2, the City must develop a route proposal. The written proposal must address all of the federal standards and factors listed in 49 CFR Section 397.71(b), which calls for the following criteria to be addressed: *Population density, type of highway, type & quantities of NRHM*, emergency response capabilities, results of consultation with affected persons, exposure and other risk factors, terrain considerations, continuity of routes, alternative routes, effects on commerce, delays in transportation, climatic conditions, congestions & accident history. The following sections address these requirements.

Population Density and Exposure Risks

United States Census Bureau (Census) identified the population in the City to be 67,553 on April 1, 2020. The estimated population by the Census on July 1, 2023, is 71,569. The highest population densities in the City occur in the central, west, and northern portions of the City. The proposed NRHM route (route) occurs in the least dense population portions of the City but does include some medium density sections of the City. **Attachment 1**, **Figure 2** displays the population densities relative to the route and **Attachment 1**, **Figure 3** displays the zoning districts relative to the route.

Type of Highways

The route includes portions of Interstate 35 (I-35), State Highway 21 (SH 21), State Highway 80 (SH 80), Ranch Road 12 (RR 12), and Farm-to-Market 110 (FM 110). I-35, SH 21, SH 80, FM 110, and RR 12 are owned and operated by TXDOT.

Type and Quantities of NRHM

Analysis of types and quantities of NRHM specific to the City of San Marcos were not conducted for the route analysis. However, the City of Austin is currently undergoing the process of designating an NRHM route through their city limits. Their designation route study identified the NRHM that passes through their study area, which includes Hays, Travis, and Williamson counties. Since the majority of the NRHM identified in this study utilize I-35, the results of this study can reasonably be considered applicable to the transportation of NRHM that passes through the city limits of San Marcos, considering the relatively short distance and shared thoroughfare (i.e., I-35).

This study identified approximately 4.1 million tons of hazardous materials that were transported through the study area, of which the vast, majority include the following: petroleum refining products (43 percent); liquefied gases, coal or petroleum (21 percent); miscellaneous industrial organic chemicals (10 percent); miscellaneous industrial inorganic chemicals (5 percent); industrial gases (4 percent); chemical preparations, not elsewhere classified (2 percent); storage batteries or plates (2 percent); asphalt coating or felt (2 percent); chemical or petroleum waste (2 percent); and surface active agents (2 percent)¹.

¹ Technical Analysis Report. City of Austin Non-Radioactive Hazardous Materials Route Designation Study. January 2020.

Emergency Response Capabilities

Emergency response entities include fire departments, police departments, emergency medical services, and hospitals. Within the city limits of San Marcos, there are four fire / emergency medical services stations, two fire stations, two police stations, and one hospital. **Attachment 1**, **Figure 4** provides the locations of the nearest emergency response entities relative to the proposed route.

The City of San Marcos Fire Department Policy 317 (**Attachment 2**), Hazardous Materials (HAZMAT) Response, provides a general framework for handling a HAZMAT incident in the City of San Marcos. "To protect the safety of the public and responders to HAZMAT incidents and to comply with all applicable state and federal laws during the management and mitigation of all HAZMAT incidents." Additionally, Policy 317 outlines department responsibilities, initial actions to implement, incident action plan, resource considerations, and notifications.

Consultation with Affected Persons

On April 3, 2025, the City sent out notifications to all political subdivisions within a 25-mile radius of the City limits. This notification advised of the route proposal and invited comments or concerns. Political subdivisions include counties, cities, Independent School Districts, Community College Districts, River Authorities, Municipal Utility Districts, and other Special Use Districts. **Attachment 1, Figure 5** provides a map of all notified political subdivisions. **Attachment 3** provides the list and addresses of all political subdivisions that were notified. No comments or concerns were received from these political subdivisions.

Terrain Considerations

Elevations along the route range from approximately 550 feet (ft) in elevation above mean sea level (AMSL) to approximately 900 ft in elevation AMSL. Most of the route, including all portions of I-35, SH 80, and FM 110, range from approximately 550 ft AMSL to approximately 680 ft FMSL. Higher elevations along the route occur in the western portions of RR 12, due to rises from the Balcones Escarpment. **Attachment 1**, **Figure 6** provides a map display of the terrain within study area and along the proposed route.

Continuity of Routes

While the route includes portions of I-35, SH-21, SH-80, FM 110, and RR 12, most of the route utilizes FM 110 to NRHM north, east, south, and west through the city limits.

From the north end of San Marcos, heading south, the route follows southbound I-35 until exit 210. The proposed route then follows FM 110 heading east, south, and west until it intersects with I-35 on the south side of the City, at exit 201, at which time it resumes on southbound I-35.

From the south end of San Marcos, heading north, the route follows northbound I-35 until exit 201. The route then follows FM 110 heading east, north, and west until it again intersects with I-35 on the north side of the City, at exit 210, at which time it resumes on northbound on I-35.

From the northeast and east ends (respectively) of San Marcos, the route follows SH 21 until the intersection of FM 110 or SH 80 until the intersection of FM 110. From these intersections, the route occurs along previously described paths utilizing FM 110 and I-35.

From the west end of San Marcos, the route utilizes RR 12 until the intersection with I-35, at which time the route occurs along previously described paths utilizing I-35 and FM 110.

Alternative Routes

Alternative routes considered include not designating a NRHM route, which would allow NRHM to continue to be transported throughout the city limits of San Marcos, including five bridges over the upper San Marcos River. This alternative would increase exposure of NRHM to residential areas, densely populated areas, and the upper San Marcos River.

Effects on Commerce, Delays in Transportation, Congestion and Accident History

The designation of an NRHM route does not preclude the delivery of NRHM to designated locations within the city limits. For instance, fuel transporters will still be permitted to deliver fuel to gas stations that are not along the proposed route. Rather, the designation of an NRHM route is to direct NRHM that is passing thru the city of San Marcos.

The proposed NRHM route would affect some travel times for NRHM freight vehicles traveling to and from the eastern state highway connections (i.e., SH 21, SH 80, and SH 123). Travel times for north, south, and west bound NRHM freight vehicles would be increased. **Table 1** displays the current estimated travel times and proposed NRHM route estimated travel times for NRHM freight vehicles.

Table 1. Current and Proposed Estimated Travel Times for NRHM Freight Vehicles

Ingress and Egress Points	Fastest Route	NRHM Proposed Route	
I-35 North bound and South bound	13 minutes (15 miles)	24 minutes (20 miles)	
SH 21 to North I-35	14 minutes (8 miles) 14 minutes (8 miles)		
SH 21 to South I-35	16 minutes (12 miles)	18 minutes (13 miles)	
SH 80 to North I-35	12 minutes (10 miles)	12 minutes (10 miles)	
SH 80 to South I-35	13 minutes (9 miles)	13 minutes (9 miles)	
SH 123 to North I-35	16 minutes (14 miles)	21 minutes (16 miles)	
SH 123 to South I-35	6 minutes (4 miles)	6 minutes (4 miles)	
RR 12 to North I-35	17 minutes (14 miles)	26 minutes (20 miles)	
RR 12 to South I-35	13 minutes (7 miles)	13 minutes (7 miles)	

Climatic Conditions

While federal regulations require consideration of climatic conditions that could affect the safety of a NRHM route, modeling tools for this analysis are often site specific. The City of Austin's designation route study did not run a site-specific model but rather investigated local planning documents that consider potential climate impacts. The conclusion of this study was that there are

no unique climatic conditions that would differ from the designation of a NRHM route. It is assumed that this conclusion would also hold true for the City of San Marcos.

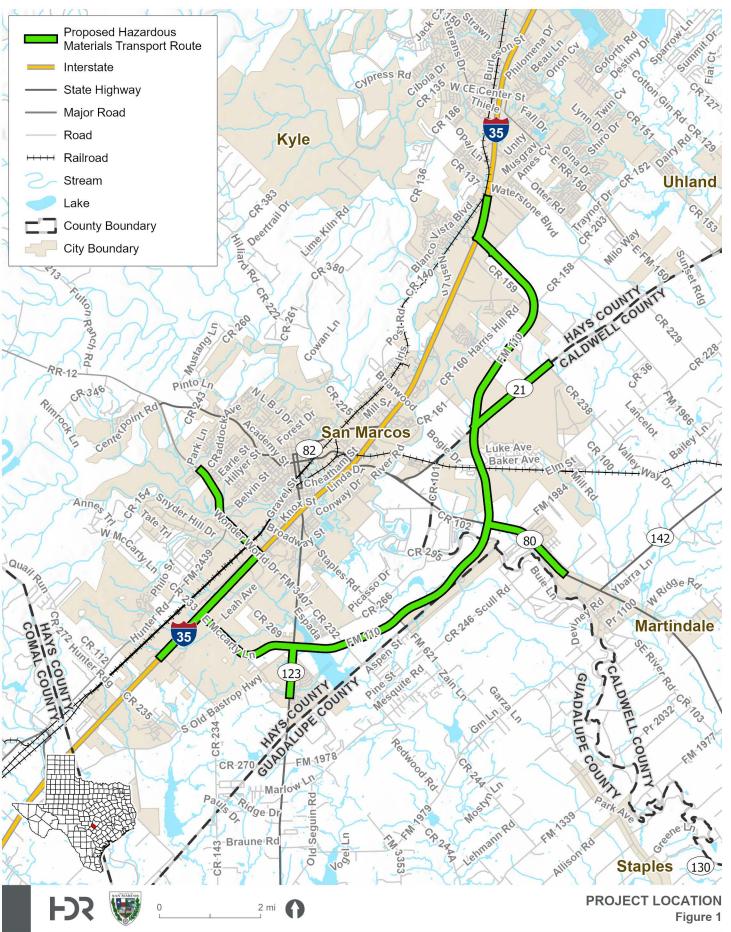
Recommended Action

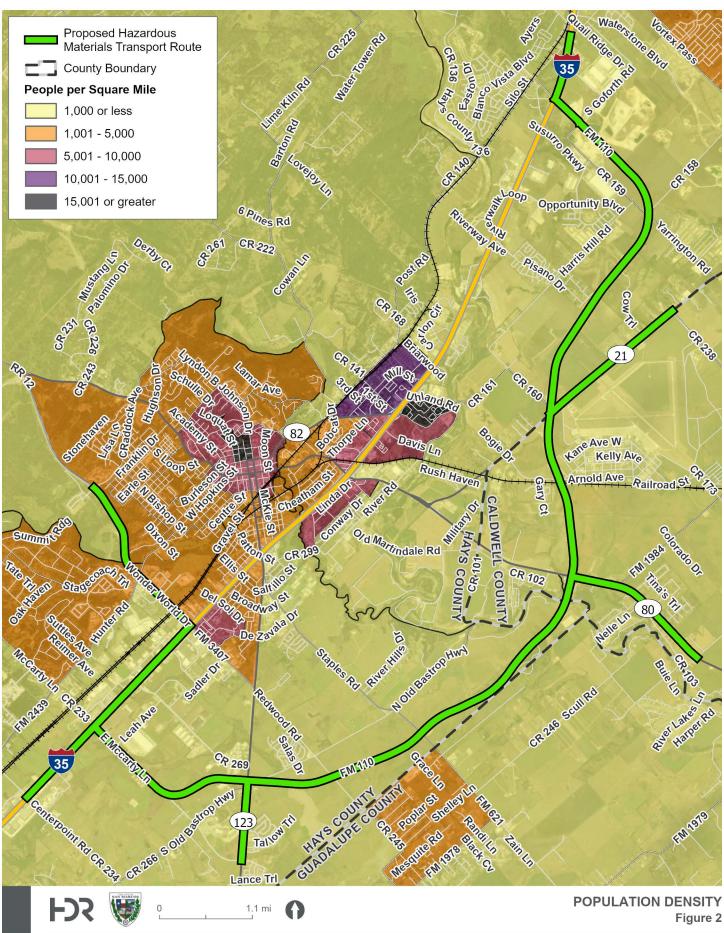
The designation of the proposed NRHM route would reduce the public health and environmental risk associated with the transport of hazardous materials and wastes within the City of San Marcos by routing vehicles transporting NRHM to less densely populated areas on the eastern end of town and away from the upper San Marcos River. Furthermore, designation of the NRHM route would comply with one of the remaining EAHCP commitments yet to be implemented, Habitat Protection Conservation Measure 5.3.4., which in turn will minimize the potential for a NRHM spill into the upper San Marcos River, where endangered species are present.

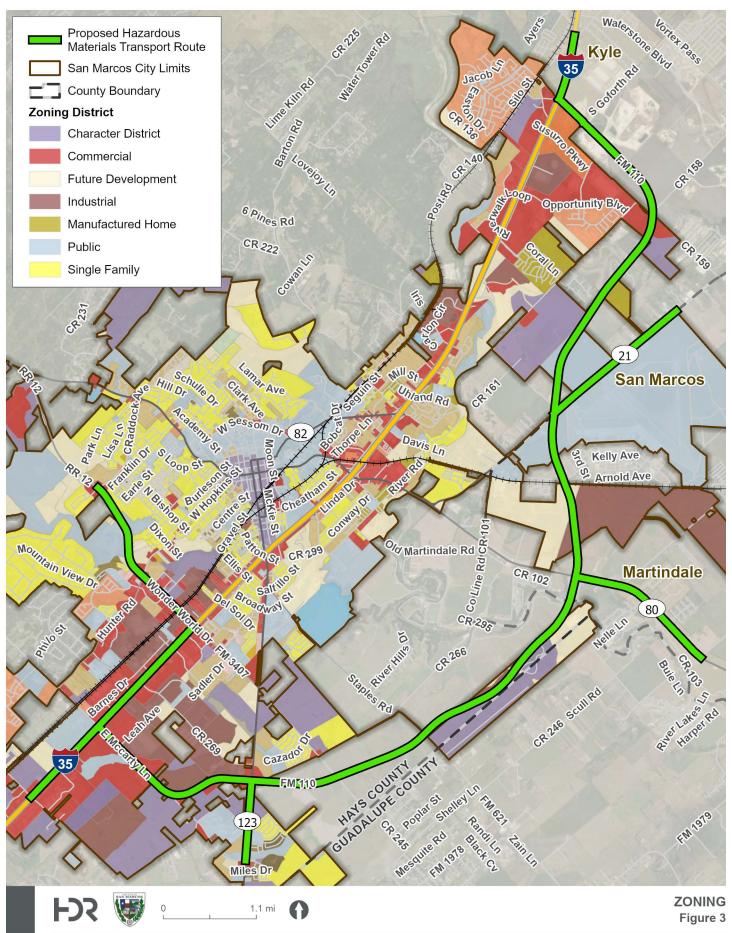
This analysis does not discover any factors that would exacerbate a NRHM release along the routing, whether terrain, climatic conditions, or emergency response capabilities. Travel times for NRHM cargo would increase in some instances, by routing vehicles to less densely populated areas on the eastern end of town and away from the upper San Marcos River.

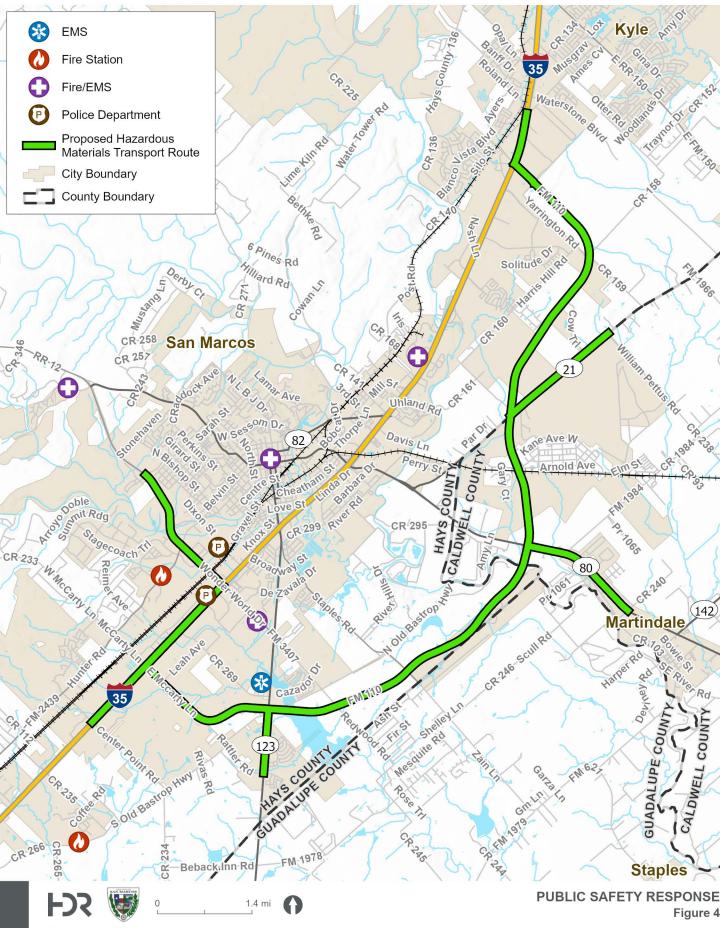
This analysis satisfies the Federal requirements to consider specific factors in the establishment of designating a NRHM route; therefore, the designation of this NRHM route is respectfully requested.

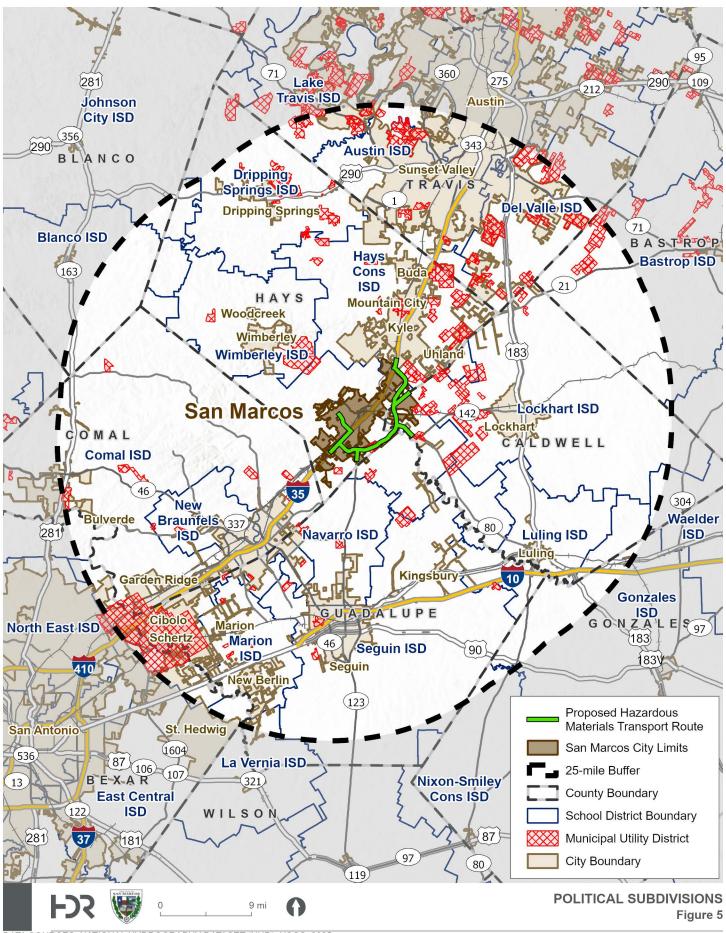
Attachment 1
Figures

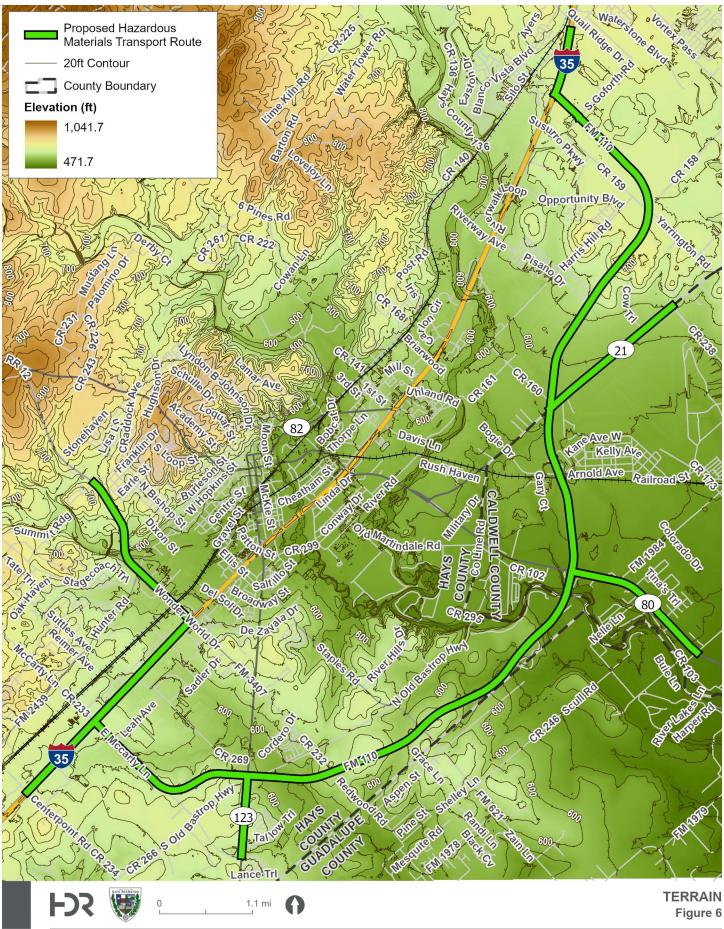


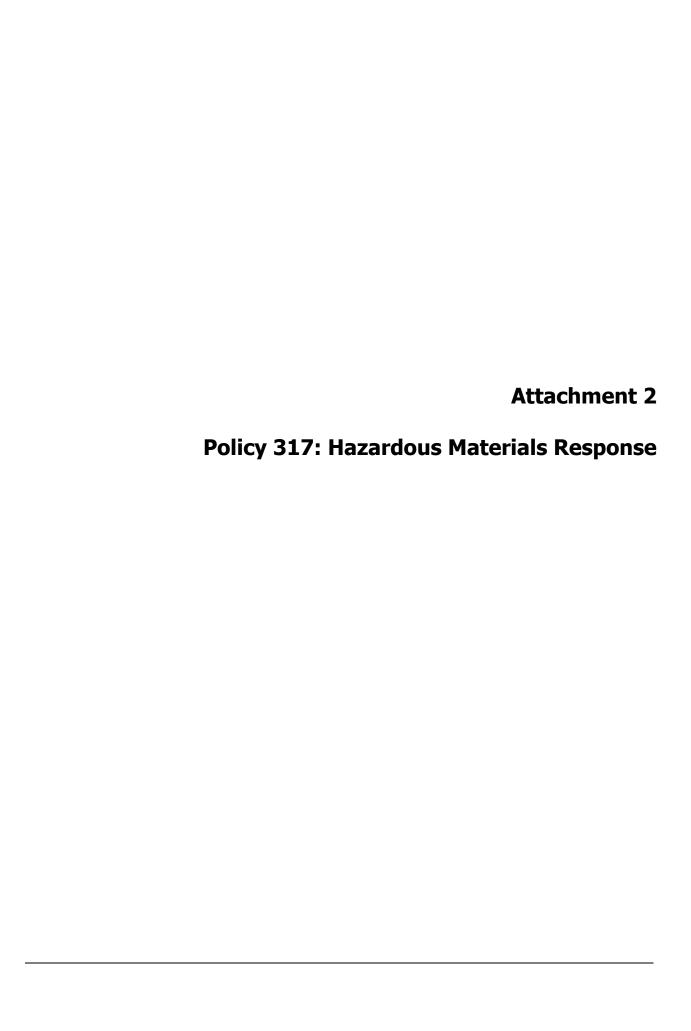












San Marcos Fire Department Policy Manual

Hazardous Materials Response

317.1

) SI MARCOS	San Marcos Fire Department Policy:		Best Practices:	Fire Chief:
*	319			Les Stephens
	Effective Date:	Revision Date:	Reviewed Date:	
	4/16/2021			

317.2 PURPOSE AND SCOPE

Hazardous materials (HAZMAT) may include toxic, flammable, corrosive, explosive, radioactive or reactive materials; materials that can cause health hazards; or a combination of these materials. The purpose of this policy is to provide a general framework for handling a HAZMAT incident.

317.3 POLICY

It is the policy of the San Marcos Fire Department to protect the safety of the public and responders to HAZMAT incidents and to comply with all applicable state and federal laws during the management and mitigation of all HAZMAT incidents.

317.4 RESPONSIBILITIES

All HAZMAT responses should be managed using the National Incident Management System (NIMS) and the Incident Command System (ICS) in accordance with regulations of the Texas Commission on Fire Protection (TCFP) for emergency response and applicable federal laws (37 Tex. Admin. Code § 435.11). All San Marcos Fire Department member's shall be trained to Texas Commission on Fire Protection Hazardous Materials Technician level per NFPA 472, Edition 2007, Chapter #4, #5, #6 and #7 or equivalent training based on AHJ needs assessment, The San Marcos Fire Department requires as a minimum that the incident commander during a hazardous material incident meet NFPA 472, Edition 2007, Chapter # 8 or equivalent training based on AHJ needs assessment,

317.4.1 INITIAL ACTIONS

If available, information should be provided by Dispatch to the units responding to a HAZMAT incident including the name and type of the material involved (e.g., hydrochloric acid, corrosive), the size and quantity of the containers involved, the nature of the problem (e.g., spill, leak) and any known dangerous properties of the materials.

The first-arriving unit approaching the incident should use caution, approach from upwind and upgrade of the incident, establish Incident Command and begin a size-up of the situation. The purpose of the size-up by the first-in company is to determine the nature and severity of the

San Marcos Fire Department Policy Manual

Hazardous Materials Response

HAZMAT incident and formulate an initial Incident Action Plan (IAP). While it may be necessary to take immediate action to make a rescue or evacuate an area, any action should be taken with an awareness of the risk to department personnel and making appropriate use of available protective equipment. It is important to avoid the premature commitment of personnel to potentially hazardous locations. In some cases, isolating the incident and denying entry until more resources arrive may be the safest approach.

In assessing the incident, all available references should be used to determine the hazards that are or potentially could be present. These references may include, but are not limited to, the U.S. Department of Transportation (DOT) Emergency Response Guidebook, the National Institute for Occupational Safety and Health (NIOSH) Pocket Guide to Chemical Hazards, Safety Data Sheets (SDS), HAZMAT business plans, manifests or bills of lading, National Fire Protection Association (NFPA) placards, U.S. DOT placards and United Nations Substance Identification Numbers. Other sources of information may be available, such as the Chemical Transportation Emergency Center (CHEMTREC®), facility personnel, department specialists or manufacturers of the materials involved.

The hazards presented by a HAZMAT incident may change significantly as the materials interact with other materials, the surrounding environment and the actions taken by responders. Responders should consider site topography, surroundings, other potential hazards and prevailing weather conditions. The initial perimeter established for the incident may need to be expanded to establish the appropriate control zones for the response (e.g., exclusion zone, contamination reduction zone, support zone).

317.5 INCIDENT ACTION PLAN

The primary goal of the IAP will be to protect the safety of the public and responders. The initial IAP should focus on identifying a safe approach for other arriving units, determining the type of hazard and the scope of the incident, isolating the area and denying entry to the public, determining incident-specific personal protective equipment (PPE) and initiating notifications. The initial IAP may be a written document or may be notes kept and controlled by the Incident Commander (IC). The initial IAP should include the following minimum information:

- (a) Incident name, agency or unified command and command post location.
- (b) Information for responding units on the best route of travel, staging locations and minimum isolation distances to maintain the safety of responding members.
- (c) The information available on the products involved or an indication that the products are not yet known.
- (d) The incident control objectives and goals.
- (e) An incident site safety plan and designation of an Incident Safety Officer.
- (f) A communications plan including radio frequencies and contact telephone numbers.

San Marcos Fire Department Policy Manual

Hazardous Materials Response

When a HAZMAT incident response will be prolonged and will extend beyond an initial operational period, a written IAP should be developed. The written IAP should utilize standard NIMS/ICS forms that may include, but are not limited to:

- ICS-201 Incident Briefing
- ICS-202 Incident Objectives
- ICS-203 Organizational Assignment List
- ICS-204 Assignment List
- ICS-205 Incident Radio Communications Plan
- ICS-206 Medical Plan
- ICS-207 Incident Organization Chart
- ICS-208 Site Safety and Control Plan

317.6 RESOURCE CONSIDERATIONS

Most HAZMAT incidents will require the IC to request additional resources in order to implement the IAP and safely mitigate the hazard.

The response to a HAZMAT incident may require a large amount of specialized resources to achieve incident stabilization and return to normal operations. The IC should consider involving:

- (a) Specialized HAZMAT teams at the technician and/or specialist levels for assistance with mitigating the release of material. The Hays County Hazardous Materials Response Team should be requested for any incident requiring Technician and Specialist level response.
- (b) Specialized operators or contractors to address post-response mitigation, removal, cleanup and required disposal of material.
- (c) Local law enforcement for assistance with scene security and evacuation, if necessary.
- (d) Activation of local, regional or Texas HAZMAT emergency response teams for assistance.
- (e) United States Coast Guard assistance for spills affecting waterways.
- (f) City of San Marcos public works and road departments for diking, diversion or other activities.

Resources shall be coordinated using NIMS/ICS as the response is reinforced. It is important that duties assigned to personnel are suitable for their level of training under federal regulations and TCFP regulations. It is also important to consider the limitations of available PPE and the limitations of chemical detection or monitoring equipment on hand when preparing to commit personnel to a potentially hazardous area.

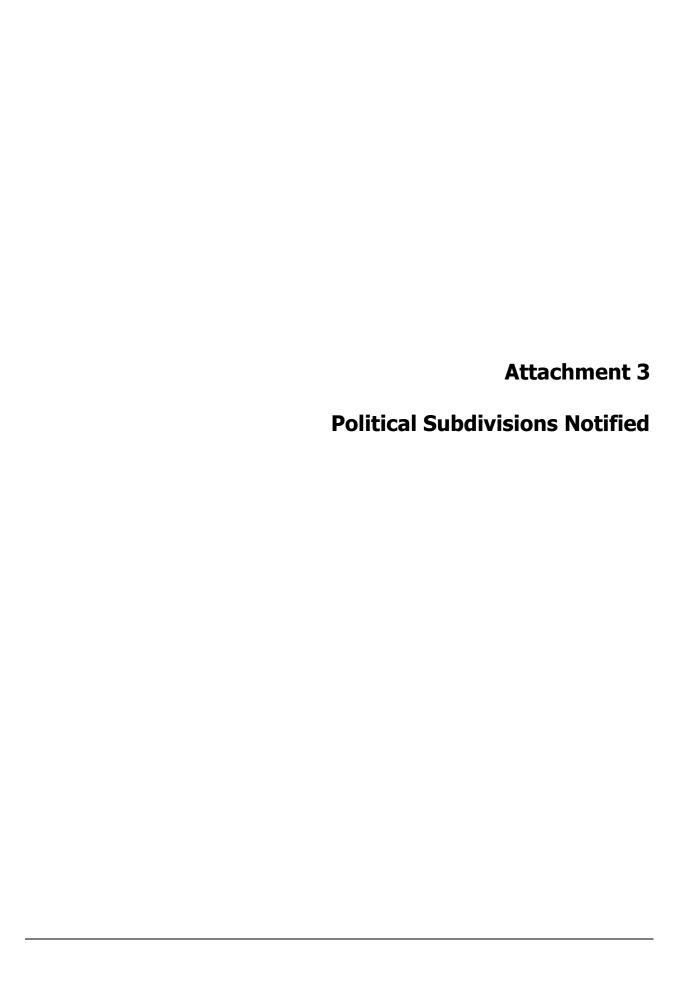
San Marcos Fire Department Policy Manual

Hazardous Materials Response

317.7 NOTIFICATIONS

Managing the response to a HAZMAT incident may involve required notifications to various local, regional, state or federal agencies. ICs should consider notifying the following agencies when applicable or required:

- (a) The public, media and other affected entities, such as schools and businesses
- (b) Adjoining jurisdictions that may be impacted by incident activities
- (c) Local and regional elected officials and emergency management personnel
- (d) State of Texas Spill-Reporting Hotline
- (e) Texas Division of Emergency Management (TDEM)
- (f) Texas Department of State Health Services (DSHS)
- (g) Texas Commission on Environmental Quality (TCEQ)
- (h) Texas Department of State Transportation (TxDOT)
- (i) Texas Department of Public Safety
- (j) United States Coast Guard (USCG)
- (k) United States Environmental Protection Agency's National Response Center



Bastrop County 804 Pecan Street Bastrop, TX 78602

Caldwell County 110 S. Main Street Lockhart, TX 78644

Gonzales County 414 St. Joseph Street Gonzales, TX 78629

Hays County 712 S. Stagecoach Trail San Marcos, TX 78666

City of Austin P.O. Box 1088 Austin, TX 78767-1088

City of Cibolo 200 South Main Street Cibolo, TX 78108

City of Garden Ridge 9400 Municipal Parkway Garden Ridge, TX 78266

City of Kyle 100 W. Center Street Kyle, TX 78640

City of Luling 509 E. Crockett Street Luling, TX 78648

City of Mountain City 101 Mountain City Drive Mountain City, TX 78610 Blanco County 101 E. Pecan Street Johnson City, TX 78636

Comal County 150 N. Seguin Avenue New Braunfels, TX 78130

Guadalupe County 307 W Court Street Seguin, TX 78155

Travis County P.O. Box 1748 Austin, TX 78767

City of Buda 405 E. Loop Street, Building 100 Buda, TX 78610

City of Creedmoor 5008 Hartung Lane Creedmoor, TX 78610

City of Kingsbury P.O. Box 99 Kingsbury, TX 78638

City of Lockhart 308 W. San Antonio Street, P.O. Box 239 Lockhart, TX 78644

City of Martindale 409 Main Street Martindale, TX 78655

City of Mustang Ridge 12800 US HWY 183 South Mustang Ridge, TX 78610-9407 City of New Braunfels 550 Landa Street New Braunfels, TX 78130

City of San Marcos 630 E Hopkins Street San Marcos, TX 78666

City of Schertz 1400 Schertz Parkway Schertz, TX 78154

City of Staples P.O. Box 27 Staples, TX 78670

City of Wimberley 221 Stillwater Road Wimberley, TX 78676

Alamo Area Council of Governments 2700 NE Loop 410, Suite 101 San Antonio, TX 78217

Bastrop County Municipal Utility District 3 919 Congress Avenue, Suite 1500 Austin, TX 78701-2156

Bollinger Municipal Utility District 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937

Caldwell County Municipal Utility District 1 PLUM CREEK CALDWELL LP, C/O PATRICK ROSE 171 BENNEY Lane, Building 1 DRIPPING SPRINGS, TX 78620-5391

Caldwell County Municipal Utility District 7 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744 City of Niederwald 8807 Niederwald Strasse Niederwald, TX 78640-4807

City of Santa Clara 1653 N. Santa Clara Road Santa Clara, TX 78124

City of Seguin 205 N. River Street Seguin TX 78155

City of Uhland 15 N. Old Spanish Trail Uhland, TX 78640

City of Woodcreek 41 Champions Cicle Woodcreek, TX 78676

Anthem Municipal Utility District Board of Directors, Anthem MUD c/o Andy Barrett Andy Barrett & Associates, PLLC 3300 Bee Cave Road, Suite 650, #189 Austin, TX 78746

Bastrop County Municipal Utility District 4 919 Congress Avenue, Suite 1500 Austin, TX 78701-2156

Buda Municipal Utility District 1 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Caldwell County Municipal Utility District 2 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937

Caldwell County Municipal Utility District 9 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Caldwell Valley Municipal Utility District 1 Walton Texas LP, c/o Walton International Group Inc. 800 N. Gainey Center Drive, Suite 345 Scottsdale, AZ 85258-2124

Canyon Ranch Municipal Utility District 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937

Capital Area Council of Governments 6800 Burleson Road, Building 310, Suite 165 Austin, TX 78744

Central Comal County Municipal Utility District 1 1980 Post Oak Boulevard, Suite 1380 Houston, TX 77056-3970

Cibolo Creek Municipal Authority P.O. Box 930 Schertz, TX 78154-0930

Comal County Water Improvement District 2 14755 Preston Road, Suite 600 Dallas. Texas 75254

Comal County Water Improvement District 3 1118 VINTAGE WAY New Braunfels. TX 78132

Cotton Center Municipal Utility District 1 Walton Texas LP, c/o Walton International Group Inc. 800 N. Gainey Center Drive, Suite 345 Scottsdale, AZ 85258-2124

Creedmoor Municipal Utility District 401 Congress Avenue, Suite 2100 Austin TX 78701-3798

Dripping Springs Municipal Utility District 1 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744 Canyon Regional Water Authority 850 Lakeside Pass New Braunfels, Texas 78130

Cascades Municipal Utility District 1 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Chisholm Municipal Utility District 1 919 Congress Avenue, Suite 1500 Austin, TX 78701-2156

Comal County Water Improvement District 1A 14755 Preston Road, Suite 600 Dallas, Texas 75254

Comal County Water Recreational District 1 P.O. Box 310009 New Braunfels, TX 78131-0009

Comal County Municipal Utility District 4 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937

Cotton Center Municipal Utility District 2 Walton Texas LP, c/o Walton International Group Inc. 800 N. Gainey Center Drive, Suite 345 Scottsdale, AZ 85258-2124

Crosswinds Municipal Utility District Board of Directors, Crosswinds MUD No 1 c/o Andy Barrett, Andy Barrett & Associates, PLLC 3300 Bee Cave Road, Suite 650 #189 Austin, TX 78746

Driftwood Conservation District c/o Winstead PC 401 Congress AVE, suite 2100 Austin, TX 78701-3798 East Hays County Municipal Utility District 1 9 Greenway Plaza, Suite 1000 Houston TX 77046-0900 East Hays County Municipal Utility District 2 9 Greenway Plaza, Suite 1000 Houston TX 77046-0900

Edwards Aquifer Authority 900 E. Quincy Street San Antonio, TX 78215

Flying W Municipal Utility District 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937

Golden Crescent Regional Planning Commission 1908 N. Laurent Street, Suite 600A Victoria, Texas 77901

Guadalupe County Development Management District c/o Bradley & Darla Mondin 6200 CROSS RD SEGUIN, TX 78155-8131

Guadalupe County Municipal Utility District 4 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937

Guadalupe County Municipal Utility District 8

Guadalupe County Municipal Utility District 10 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937

Hays County Municipal Utility District 4 c/o Zachariah T. Evans, McGinnis Lochridge LLP 1111 W 6th Street, Apartment 400 Austin, TX 78703-5345

Hays County Municipal Utility District 6 c/o Winstead PC 401 Congress Avenue, Suite 2100 Austin, TX 78701-3798

Green Valley Special Utility District P.O. Box 99 Marion, TX 78124

Guadalupe County Municipal Utility District 3 c/o Newquest Properties 8827 W SAM HOUSTON PKWY N #200 HOUSTON, TX 77040

Guadalupe County Municipal Utility District 5 c/o ABHR 919 Congress Ave, Suite 1500 Austin TX 78701-2156

Guadalupe County Municipal Utility District 9 919 Congress Avenue, Suite 1500 Austin, TX 78701-2156

Hays County Municipal Utility District 5 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Hays County Municipal Utility District 7 1108 Lavaca Street, Suite 510 Austin, TX 78701 Hays County Municipal Utility District 7A 919 Congress Avenue, Suite 1500 Austin, TX 78701-2156

Hays County Municipal Utility District 9 919 Congress Avenue, Suite 1500 Austin. TX 78701-2156

Headwaters Municipal Utility District 901 South MoPac Expressway, Suite 225 Austin, TX 78746-0052

Kyndwood Municipal Utility District 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Lantana Municipal Utility District of Caldwell County 9 Greenway Plaza, Suite 1000 Houston TX 77046-0900

LaSalle Municipal Utility District 2 Board of Directors, LaSalle MUD 2, c/o Andy Barrett Andy Barrett & Associates, PLLC 3300 Bee Cave Road, Suite 650 #189 Austin, TX 78746

LaSalle Municipal Utility District 4
Board of Directors, LaSalle MUD 4, c/o Andy Barrett
Andy Barrett & Associates, PLLC
3300 Bee Cave Road, Suite 650 #189
Austin, TX 78746

Legacy Municipal Utility District 1 10007 Huebner Road, Suite 303 San Antonio, TX 78240-1646

Maxwell Special Utility District 216 Main Street Maxwell, TX 78656

Meyer Ranch Municipal Utility District 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937 Hays County Municipal Utility District 7B 919 Congress Avenue, Suite 1500 Austin, TX 78701-2156

Hays County Municipal Utility District 11 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

J-O Ranch Municipal Utility District

Lake Dunlap Water Control & Improvement District c/o McClean & Howard, LLP 901 S. MoPac Expressway, Buildijng II Austin, TX 78746

LaSalle Municipal Utility District 1
Board of Directors, LaSalle MUD 1, c/o Andy Barrett
Andy Barrett & Associates, PLLC
3300 Bee Cave Road, Suite 650 #189
Austin, TX 78746

LaSalle Municipal Utility District 3
Board of Directors, LaSalle MUD 3, c/o Andy Barrett
Andy Barrett & Associates, PLLC
3300 Bee Cave Road, Suite 650 #189
Austin, TX 78746

LaSalle Municipal Utility District 5
Board of Directors, LaSalle MUD 5, c/o Andy Barrett
Andy Barrett & Associates, PLLC
3300 Bee Cave Road, Suite 650 #189
Austin, TX 78746

Lone Oak Farm Municipal Utility District 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937

Moore's Crossing Municipal Utility District 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744 Mustang Ridge Municipal Utility District Board of Directors, Mustange Ridge MUD, c/o Andy Barrett Andy Barrett & Associates, PLLC 3300 Bee Cave Road, Suite 650 #189 Austin, TX 78746

Needmore Ranch Municipal Utility District

North Hays County Municipal Utility District 1 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937

North Hays County Municipal Utility District 2 1108 Lavaca Street, Suite 510 Austin, TX 78701

Oatman Hill Municipal Utility District 387 W. Mill Street New Braunfels. TX 78130-7942 Parklands Municipal Utility District 1 C/O WALTON GLOBAL HOLDINGS, LLC 8800 N GAINEY CENTER DR STE 345 Scottsdale AZ 85258

Parkplace Municipal Utility District 919 Congress Avenue, Suite 1500 Austin, TX 78701-2156 Pilot Knob Municipal Utility District 1 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Pilot Knob Municipal Utility District 2 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744 Pilot Knob Municipal Utility District 3 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Pilot Knob Municipal Utility District 4 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744 Pilot Knob Municipal Utility District 5 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Ranch At Clear Fork Creek Municipal Utility District 1 c/o Ranch Road Watermill LLC 2113 Estes Park Drive Southlake, TX 76092-3836

Ranch at Clear Fork Creek Municipal Utility District 2 c/o Ranch Road Watermill LLC 2113 Estes Park Drive Southlake, TX 76092-3836

Ranch at Clear Fork Creek Municipal Utility District 3 c/o Ranch Road Watermill LLC 2113 Estes Park Drive Southlake, TX 76092-3836

Rebecca Creek Municipal Utility District 1130 Nobhill Drive Spring Branch, TX 78070

Shady Hollow Municipal Utility District PO Box 1220 Dripping Springs, TX 78620-1220

South Buda Water Control & Improvement District 1 2601 Forest Creek Drive Round Rock TX 78665

Southeast Travis County Municipal Utility District 1 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744 Southeast Travis County Municipal Utility District 2 919 Congress Avenue, Suite 1500 Austin, TX 78701-2156 Southeast Travis County Municipal Utility District 3 919 Congress Avenue, Suite 1500 Austin, TX 78701-2156 Southeast Travis County Municipal Utility District 4 919 Congress Avenue, Suite 1500 Austin, TX 78701-2156

Sunfield Municipal Utility District 1 14755 Preston Road, Suite 600 Dallas, Texas 75254 Sunfield Municipal Utility District 2 14755 Preston Road, Suite 600 Dallas, Texas 75254

Sunfield Municipal Utility District 3 14755 Preston Road, Suite 600 Dallas, Texas 75254 Sunfield Municipal Utility District 4 14755 Preston Road, Suite 600 Dallas, Texas 75254

Sky Ranch Municipal Utility District 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744 Springhollow Municipal Utility District 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Tangelwood Forest Limited District c/o The Carlton Law Firm PLLC 2705 Bee Caves Rd Suite 200 Austin, TX 78746-5843

Travis County Municipal Utility District 3 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Travis County Municipal Utility District 5 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744 Travis County Municipal Utility District 6 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Travis County Municipal Utility District 7 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744 Travis County Municipal Utility District 8 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

Travis County Municipal Utility District 26 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937

Travis-Creedmoor Municipal Utility District 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744

True Ranch Municipal Utility District 1 6061 Broadway San Antonio TX, 78209

Upper San Marcos Watershed Reclamation & Flood Control District 1517 Aquarena Springs Drive San Marcos, TX, 78666-7261

Wayside Municipal Utility District 4301 Bull Creek Road, Suite 150 Austin, TX 78731-5937 Wild Ridge Municipal Utility District 100 Congress Avenue, Suite 1300 Austin, TX 78701-2744 York Valley Municipal Utility District c/o Jodie Rapp P.O. Box 341419 Austin, TX 78734

Guadalupe-Blanco River Authority 933 East Court Street Seguin, TX 78155

Lower Colorado River Authority P.O. Box 220 Austin, TX 78767 Wimberley Independent School District 951 FM 2325 Wimberley, TX 78676

Blanco Independent School District 814 11th Street Blanco, TX 78606 Johnson City Independent School District 304 North LBJ Drive, P.O. Box 498, Johnson City, TX 78636

Dripping Springs Independent School District 510 W. Mercer Street Dripping Springs, TX 78620 Austin Independent School District 4000 South IH 35 Frontage Road Austin, TX 78704

Hays Consolidated Independent School District 21003 IH 35 Frontage Road Kyle, TX 78640-4745 Del Valle Independent School District 5301 Ross Road Del Valle, TX 78617

San Marcos Consolidated Independent School District 631 Mill Street San Marcos, TX 78666 Bastrop Independent School District 906 Farm Street Bastrop, TX 78602

Lockhart Independent School District 419 Bois D'Arc Street Lockhart, TX 78644

Luling Independent School District 115 West Bowie Street Luling, TX 78648

Prairie Lea Independent School District 6910 San Marcos HWY 80 Prairie Lea, TX 78661 Comal Independent School District 1404 IH 35 North New Braunfels, TX 78130

New Braunfels Independent School District 1000 N. Walnut Avenue New Braunfels, TX 78130 Navarro Independent School District 6450 N State Hwy 123 Seguin, TX 78155

Seguin Independent School District 1221 E. Kingsbury Street Seguin, TX 78155

Schertz-Cibolo-Universal City Independent School District 1060 Elbel Road Schertz, TX 78154

Marion Independent School District 211 West Otto Street, PO BOX 189 Marion, TX 78124

Austin Community Colleges District 6101 Highland Campus Drive Austin, TX 78752 Alamo Colleges District 2222 N. Alamo Street San Antonio, TX 78215

Texas Department of Transportation c/o William Semora South Travis Area Office 9725 S. I-35 Austin, TX 78744