

75 Ways to Confront Rapid Urban Growth in an Unincorporated Community

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This case study analyzes a recent urban planning effort in the community of Comfort, Texas—which, like 90% of its neighbors in the Texas Hill Country—lacks a municipal government. The Texas Hill Country region is home to three of the ten fastest growing large counties in the United States, yet a widespread aversion to government fosters a lack of regulation that today threatens the local quality of air, water, and land. On November 3, 2015, 71% of Comfort residents voted against a proposition to incorporate their community. While the vote was clear in its rejection of municipal government, it did not suggest how a loose assortment of property owners, developers, non-profits, utility districts, and county officials might address the multiple and pressing challenges associated with rapid urban growth.

Comfort Vision 2050 offers a plan tailored to the realities of life in an unincorporated community, establishing a novel approach to urban planning that is decentralized, non-governmental, incremental, actionable, coordinated, measurable, and transparent. The urban action plan specifically provides a list of 75 Strategic Initiatives that are small-scale, diverse, and possible to achieve without the benefit of municipal government. Collectively, the plan suggests a dispersed, distributed decision-making process that does not rely on a single organization or individual for success.

This case study describes the efforts of a university-based community design center to develop a novel approach to urban planning in an unincorporated community. Ultimately, Comfort’s experience highlights the need to develop regional planning strategies that can address the needs of unincorporated communities, which after all need urban planning for all the same reasons that cities do: to prevent the fragmentation of local ecologies, maintain critical infrastructures, ensure access to housing, preserve physical and cultural history, attract and keep good jobs, expand critical services, facilitate civic discourse, and ensure timely decision-making.

BRIEF HISTORY OF COMFORT, TEXAS: FREETHINKERS, ABOLITIONISTS, AND AVERSION TO INCORPORATION

Comfort, Texas is an unincorporated, census-designated place (CDP) that had 3,717 residents in 2019. The CDP lies at the western edge of Kendall County in the heart of the Texas Hill Country, 45 miles northwest of San Antonio. Ernst Hermann Altgelt, a German land surveyor, founded Comfort in 1854 at the confluence of Cypress Creek and the Guadalupe River.¹ Comfort emerged during a period when multiple waves of German immigrants, alarmed by the failed liberal revolutions of 1848, left Europe and relocated to the Texas Hill Country. Communities like Comfort maintained a strong historical dedication to their native German tongue, and many public schools did not hire English-speaking teachers after 1900.²

In the early years, Comfort was home to an unusually large number of Freidenkers. This term, which translates as “free-thinkers,” describes nineteenth-century German intellectuals who embraced empiricism and shunned organized religion. Most Comfort residents were also strongly pro-Union and fiercely opposed Texas’ decision to secede and join the Confederacy in 1861. The community’s historical experience with failed governance in Europe, geographic isolation in the United States, and commitment to civil liberties may begin to explain the resistance of current Comfort residents to formal government.

Comfort existed as a relatively isolated community until the arrival of the San Antonio and Aransas Pass Railroad in 1887, an event that transformed Comfort into a major shipping center for cotton. Even with the arrival of the railroad and religion, Comfort remained a small community surrounded by large ranches throughout most of the twentieth century. During the 1980s, corporate agribusiness, outdoor tourism, and youth camps emerged as critical economic staples.³

Comfort began to experience rapid urban growth in the early years of the twenty-first century, as the population expanded from 2,358 to 3,441 between the years 2000 and 2016.⁴ Similar trends are common within the San Antonio-New Braunfels Metropolitan Statistical Area (MSA), which experienced an overall population increase of 17% between the years 2010-2018, making it the 22nd fastest growing region in the country.^{5,6} They are also common within host Kendall County,

where the population grew 37% between the years 2010 and 2018, and across the larger Texas Hill Country, home to three of the ten fastest growing large counties in the United States.^{7,8}

In 2015, a group called the Comfort Preservation Alliance proposed that the best way to manage local growth was to create a municipal authority, to be composed of a mayor and four council members, with the power to implement zoning and collect local sales and property taxes.⁹ On November 3, 2015, 71% of Comfort residents voted in a Kendall County Special Election to reject incorporation. In doing so, local voters affirmed deeply held community beliefs that now provide a foundation for Comfort Vision 2050: First, the vote expressed the community's clear commitment to property rights, which is understandable in a region historically composed of large-scale ranch owners. Second, the vote reinforced a broad fiscal conservatism and aversion to new taxes, again not surprising in a community that voted 77% Republican in the 2016 Presidential Election.¹⁰ Third, the vote gave voice to a widespread if passionately contested belief that, in a community founded by German Freidenkers and abolitionists, individualized and decentralized decision-making remains preferable to the creation of a centralized municipal authority.

URBAN PLANNING IN AN UNINCORPORATED COMMUNITY

Comfort's struggle to confront the challenges associated with rapid urban growth is typical of communities in the Texas Hill Country, where 90% of its neighbors lack a municipal government. The condition is ubiquitous in Texas and throughout the United States, where 26% and 10% of the population lives in unincorporated communities, respectively.^{11,12} These statistics indicate that while Comfort Vision 2050 represents a modest plan for a small community, it could have broad implications at the local, regional, and national scales.

Texas Local Government Code Chapters 211-229 provides incorporated cities with taxing and zoning authority to pursue traditional urban planning agendas. In unincorporated communities that lack these tools, challenges like increased traffic, lack of affordable housing, and rapidly expanding infrastructure obligations threaten the quality of life for all residents. The risks are partially financial, as county property tax revenues often fail to keep pace with the increasing costs of new roads, schools, and emergency services. They are also environmental, as the rapid development and subsequent fragmentation of rural land threatens the quality of air, water, and land that makes the Hill Country so desirable. The State of Texas, for example, develops 1.5 million acres of land every 10 years, while it subdivides another 3.5 million acres into smaller pieces.¹³

These political realities help clarify the appropriate scope and aims for Comfort Vision 2050. A traditional vision plan won't work in Comfort because there is no organization with the

authority or resources to implement it. Instead, Comfort's unincorporated status means that Comfort Vision 2050 must identify and leverage the existing tools that the community has available to it. So, what planning tools do residents have at their disposal? One way to answer that question is to assess the ability of various actors at the federal, state, county, and local levels to advocate for the community's needs.

Urban planning at the federal level. The impact of federal authorities on local growth in Comfort may appear remote, but it is extensive and very real. Much of it comes in the form of regulations, such as limits that the U.S. Environmental Protection Agency places on point source water pollution. But the federal government also offers numerous financial resources, such as the U.S. Department of Housing and Urban Development grant that funded the Comfort Vision 2050 process. Unfortunately, Comfort's unincorporated status makes advocacy at the federal level impracticable and prevents the community from applying for most federal grants.

Urban planning at the state level. The impact of state authorities on life in Comfort is more immediate and easier to assess. The work of the Texas State Legislature, for example, affects everything from the scope of county authority to tax policy. Similarly, regulatory bodies like the Texas Department of Transportation and the Texas Commission on Environmental Quality regulate infrastructural and environmental networks.

Urban planning at the county level. The fundamental importance of county government in an unincorporated community is difficult to overstate. In most unincorporated areas, counties represent the only form of government and therefore provide the only mechanism of land use control. Since the second half of the twentieth century, counties have generally facilitated rural sprawl by underleveraging zoning authority and land use controls in unincorporated communities. Counties have strong disincentives to regulate development, as they seek to maximize tax revenue and minimize administrative burdens.¹⁴

These political dynamics are even more complex in Kendall County, which like most counties in Texas, lacks the authority to implement zoning ordinances and construction codes. These tools that are commonplace in virtually every other state in the U.S. The limited authority that most Texas counties have to regulate land use means that urban development in unincorporated communities like Comfort proceeds with limited governmental coordination or oversight. Nonetheless, in Comfort the most significant land use controls continue to reside at the county level, where Section 232 of the Texas Local Government Code allows host Kendall County to control urban development by regulating the subdivision of land. Without zoning authority, Kendall County restricts the subdivision of land by regulating water supply, drainage, transportation infrastructure, and environmental controls.¹⁵ For example, the Texas Development Water Board has designated Comfort

30 Vision Statements

Environmental

1. Comfort will maximize biodiversity and support native ecosystems that allow the Hill Country's plant and wildlife networks to flourish.
2. Comfort will favor sustainable development strategies that lessen energy consumption, water consumption, carbon emissions, herbicide/pesticide use, and solid waste.
3. Comfort will leverage Low Impact Development strategies.
4. Comfort will favor residential and commercial developments that protect dark sky environments.
5. Comfort will expand energy-efficiency resources to homeowners.

Infrastructure

6. Comfort will expand its integrated network of walkable streets.
7. Comfort will work with KCWID #1 to define its mission and role in community development.
8. Comfort will pursue flood remediation strategies at both local and regional scales.
9. Comfort will achieve twenty-first century infrastructure technology networks.
10. Comfort will create inspiring new community spaces.

Housing

11. Comfort will expand multifamily housing options for current and future residents.
12. Comfort will expand access to affordable and efficient housing options.
13. Comfort will pursue compact development as one option for future residential growth.
14. Comfort will encourage new developers to pursue mixed-use programming.
15. Comfort will safeguard existing low-density, single-family fabric, allowing it to remain intact.

Preservation

16. Comfort will expand local capacity to advance historic preservation.
17. Comfort will invest in physical heritage by valuing and preserving buildings and infrastructure.
18. Comfort will invest in living heritage by supporting and utilizing active civic organizations.
19. Comfort will safeguard rural character by working to keep remaining large tracts of land intact.
20. Comfort will construct new buildings that complement existing architectural heritage.

Economic

21. Comfort will continue to emerge as a destination for retirees.
22. Comfort will maintain and expand its existing tourist economy.
23. Comfort will solidify and expand economic leadership in the community.
24. Comfort will increase the retail and service capacity of existing businesses.
25. Comfort will pursue new, well-paying jobs in industries that do not threaten rural character.

Community

26. Comfort will remain a community that embraces its multi-ethnic heritage.
27. Comfort will work to increase professional service options to all ages and income brackets.
28. Comfort will expand on the existing spirit of volunteerism.
29. Comfort will invest in a new generation of leaders.
30. Comfort will become a community dedicated to lifelong learning.

Figure 1. Comfort 2050 Vision Statements.

as a Priority Groundwater Management Area, meaning that the Kendall County Commissioner's Court has the authority to regulate groundwater production based on acreage or tract size.¹⁶ Therefore, individual lots that rely on a well and on-site sewage facility must have a minimum lot size of three acres, while subdivisions served by a public water system and an on-site sewage facility (OSSF) must maintain a minimum lot of one acre.¹⁷ In Kendall County, the regulation of water supply is the de facto policy mechanism to keep residential densities low and preserve the rural character and quality of life. The Kendall County Water Control and Improvement District #1 (KCWCID #1) similarly catalyzes or hinders new development by deciding how and where to invest in new water and sewer infrastructure.

Urban planning at the local level. Local organizations like the Comfort Area Foundation (CAF), the Comfort Heritage Foundation (CHF), and the Chamber of Commerce handle many of the critical day-to-day affairs in Comfort. Each of these organizations enjoy significant local knowledge, yet they rely on volunteers, enjoy no official regulatory authority, and are limited by a lack of financial resources.

Non-profit organizations such as Comfort Table and Hill Country Mission provide crucial nutritional and healthcare assistance to residents in need. The Comfort community counts on these contributions, which are indispensable given the lack of a municipal social safety net. Comfort's business owners also serve the community with generous civic investment and philanthropic support. Finally, individual residents in Comfort offer daily leadership in the community.

PRINCIPLES FOR COMFORT VISION 2050

Comfort Vision 2050 establishes four principles that recognize the relative capacities and limitations of the state, regional, and local actors to contribute to urban planning solutions:

Invest in a grassroots/bottom-up approach. In the absence of municipal government, Comfort 2050 utilizes a grassroots and strengths-based approach that relies on the trust of community members to broaden the range of potential planning solutions.

Leverage non-governmental leadership mechanisms. In the absence of municipal government, Comfort 2050 disperses decision-making among multiple actors including county authorities, utility districts, a school district, volunteer organizations, non-profits, businesses, and private residents. The alternative urban planning framework simultaneously expands the civic capacities of these organizations and asks them to commit to a shared community vision.

Cultivate broad public engagement. The contentious 2015 incorporation vote generated deep-seated and lingering distrust in the community. Comfort 2050 addresses this difficult

history by tapping a wide range of non-professional, community stakeholders to lead various portions of the four public visioning sessions.

Develop a decentralized and incremental approach to implementation. To keep community-members engaged and productive, Comfort 2050 forms six working groups to advance the 75 Strategic Initiatives. The CAF is coordinating the larger grassroots process: convening meetings, forming working groups, providing administrative support, facilitating communications, managing media communications, and maintaining a website to track progress.

STRUCTURE OF COMFORT VISION 2050

The Comfort Vision 2050 process began in March 2019 with a series of community interviews, conducted by the planning team. The team next facilitated a series of four public visioning sessions, designed to elicit feedback from residents on the following topics: Demographics and Economics, Housing and Preservation, Environment and Infrastructure, Community and Decision-Making. Upon completion of the public visioning sessions, the planning team produced a series of 30 Vision Statements that described the community's current values and goals for 2050. The team then utilized the statements to produce 75 Strategic Initiatives which, taken together, would help the community advance towards that goal.

Comfort 2050 organizes the 30 Visions Statements and 75 Strategic Initiatives according to the following topics:

Environment. This section addresses the ecological systems in the Texas Hill Country, including how they are impacted by human activity. Critical issues include flood water management, cooperative agreements with neighboring counties, and managing ecological fallout from the rapid subdivision of land.

Infrastructure. This section addresses the community's fundamental physical and organizational structures and facilities. Critical issues include expanding road infrastructure to accommodate pedestrians and bicyclists, establishing walkable street typologies, and confronting pending water shortages.

Housing. This section addresses this fundamental physical, social, and economic need. Critical issues include expanding multifamily housing typologies, adding affordable housing, and limiting tract housing,

Preservation. This section addresses attempts to preserve, conserve, and protect both physical and living history while advancing cultural continuity. Critical issues include expanding administrative capacity to advance historic preservation, investing in physical and cultural heritages, and keeping existing large land parcels intact.

75 Strategic Initiatives

Environmental

1. Recruit “citizen scientists” to control invasive species.
2. Apply to Texas Master Naturalists.
3. Develop a voluntary Habitat Conservation Plan.
4. Support the use of native plant species.
5. Hold an annual competition for the best native plant garden.
6. Establish a Keep Texas Beautiful Local Affiliate in Comfort.
7. Develop an Urban Tree Canopy assessment.
8. Develop a Watershed Protection Plan.
9. Initiate an online recycling program.
10. Ask Kendall and Kerr Counties to adopt LID regulations.
11. Plan a Low Impact Development workshop.
12. Support IDA International Dark Sky program.
13. Implement a Night Sky Friendly Business Program.
14. Implement the Texas PACE Program.

Infrastructure

15. Encourage Kendall County to expand roadway standards.
16. Build more streets like High St. and Idlewilde St.
17. Add bicycle infrastructure to Comfort.
18. Add roundabout at Highway 27 and 5th St.
19. Reconfigure Front Street for pedestrian.
20. Repair and extend the street grid south of I-10.
21. Clarify KCWCID #1’s role in community development process.
22. Work to secure additional water rights.
23. Support KCWCID #1’s pursuit of alternative water resources.
24. Work with Kendall County to pursue infrastructure grants.
25. Use incremental strategies to control flooding.
26. Build a riparian walking park along Cypress Creek.
27. Extend frontage roads along Interstate 10.
28. Join the MPO.
29. Offer free wifi in public areas.
30. Utilize the existing Community solar system.
31. Develop new Community Park at 8th St. and Broadway.
32. Build an inspiring new pedestrian promenade.

Housing

33. Pursue developers who offer multi-family housing.
34. Ask Kendall County to facilitate multifamily housing.
35. Add Accessible Dwelling Units to single-family homes.
36. Support affordable, accessible, efficient housing.
37. Encourage new gridded, compact development.
38. Pursue quality, mixed-use development north of I-10.
39. Imagine a dynamic future for AJW facility.

Preservation

41. Expand capacity of Comfort Heritage Foundation.
42. Train new historic preservation advocates.
43. Send local contractors to the Rehabber’s Club.
44. Ask the San Antonio Conservation Society to do a workshop.
45. Start a Historic Preservation Tax Credit Education Program.
46. Create an online archive of Comfort’s physical heritage.
47. Work with a historic preservation specialist.
48. Document Comfort’s physical heritage with a 3D Lidar map.
49. Seek financial assistance for restoration from the NTCIC.
50. Document oral histories to extend Comfort’s living heritage.
51. Ask Partners for Sacred Places to support local churches.
52. Encourage conservation easements on agricultural property.
53. Create Voluntary Design Guidelines in the Historic District.

Economics

54. Expand the Golden Age Center.
55. Pursue new senior living facilities.
56. Petition Kendall County to collect Hotel Occupancy Tax.
57. Plan for a Comfort Visitors Center.
58. Leverage potential tourism from Youth Camp.
59. Expand the Chamber of Commerce’s mission and resources.
60. Encourage businesses to extend hours.
61. Establish and promote a Shop Local Campaign.
62. Support Comfort entrepreneurs and start-ups.
63. Leverage the resources of the BKCEDC.

Community

64. Celebrate German-Texan and Tejano heritage.
65. Organize exchanges between local churches.
66. Attract recent graduates from medical professional schools.
67. Attract urgent care or family medicine facility to Comfort.
68. Encourage Comfort ISD grads to move home after college.
69. Help Hill Country Mission for Health set up in Comfort.
70. Create a Comfort Community Service Program.
71. Formalize internship opportunities for high school students.
72. Participate in a leadership training institute.
73. Create a Mothers’ Day Out Program.
74. Increase participation in adult education programs.
75. Support the Comfort Public Education Foundation.

Figure 2. Comfort Vision 2050 Strategic Initiatives.

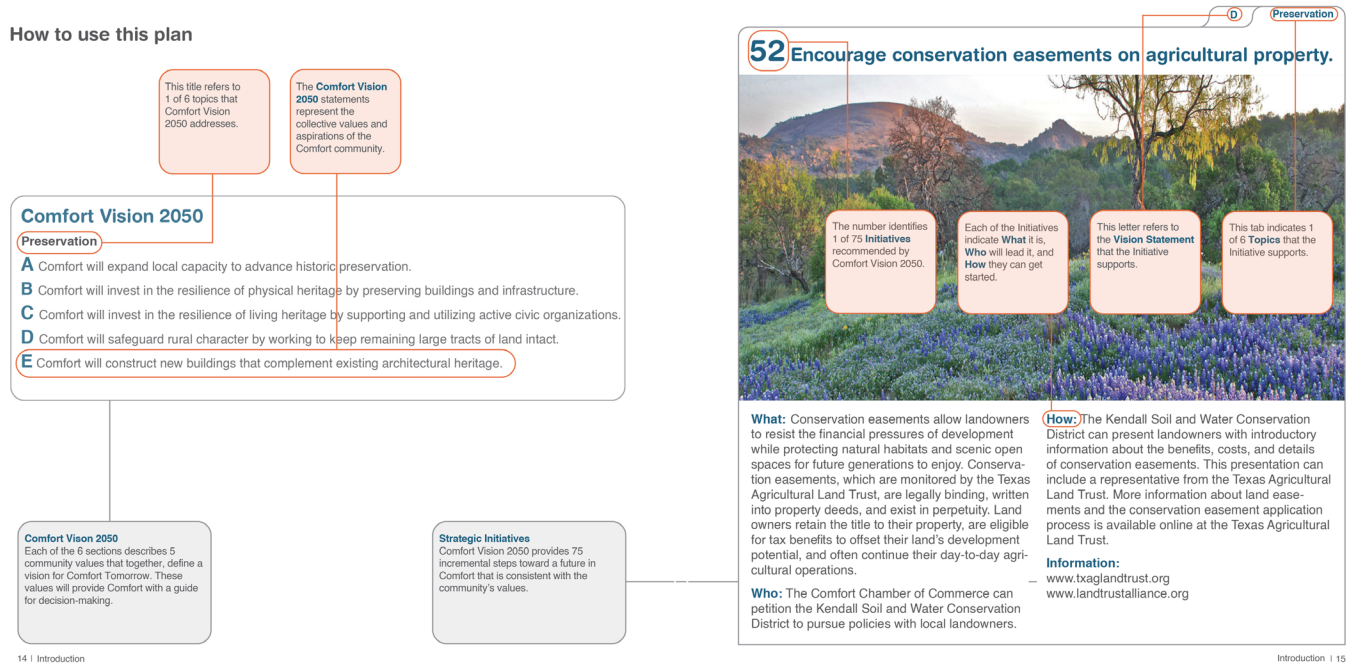


Figure 3. How to Use This Plan.

Economics. This section addresses efforts to advance material prosperity and provide services to the community and region. Critical issues include expanding and diversifying the job market, finding a way to capture sales tax, and expanding services and amenities.

Community. This section addresses collective social values, responsibilities, and actions. Critical issues include finding ways for the community to embrace its multi-ethnic heritage, increasing professional options for young people, and expanding social services to the community.

IMPLEMENTATION OF COMFORT VISION 2050

Comfort Vision 2050 offers a unique vision for the future, one specifically tailored to the political realities of life in an unincorporated community. Currently, the decision-making and administrative structure in Comfort is dispersed amongst state officials, county authorities, local volunteer organizations, non-profits, local businesses, and individual residents. This arrangement keeps Comfort running on a day-to-day and year-to-year basis, but does not allow the community to address long-term issues related to future growth. Given Comfort's unincorporated status, Comfort Vision 2050 offers an implementation strategy that is decentralized, incremental, actionable, coordinated, measurable, and transparent.

Working groups offer a decentralized, non-governmental approach to decision-making. Comfort Vision 2050 recommends 75 discreet Strategic Initiatives that community volunteers, organized into working groups, can accomplish

with a minimum amount of coordination. In order to facilitate this process, Comfort Vision 2050 proposes the formation of six working groups: Environment Working Group, Infrastructure Working Group, Housing Working Group, Preservation Working Group, Economic Working Group, and Community Working Group. Each Working Group is free to design the focus, scope, and pace of their efforts to match the aspirations and capacity of individual members.

Comfort Vision 2050 offers Strategic Initiatives that are incremental and actionable. Comfort Vision 2050 provides 75 Strategic Initiatives that are diverse in scope and complexity. Some of the initiatives are large, some are small; some will take years to complete, some can be accomplished in a short amount of time. When taken together, the 75 initiatives advance Comfort's comprehensive vision for the future. Still, it is possible for a working group to accomplish any single initiative without relying on the success of the 74 others.

CAF will coordinate Comfort Vision 2050. Comfort Vision 2050 proposes that the CAF coordinate the plan's decentralized, non-governmental approach to decision-making. CAF's responsibilities here include convening meetings, forming working groups, providing administrative support, facilitating communication amongst working groups, facilitating communication between working groups and outside organizations, and managing media communications and online content.

Comfort Vision 2050 is measurable and transparent. In order for participants to rate Comfort Vision 2050's success, they

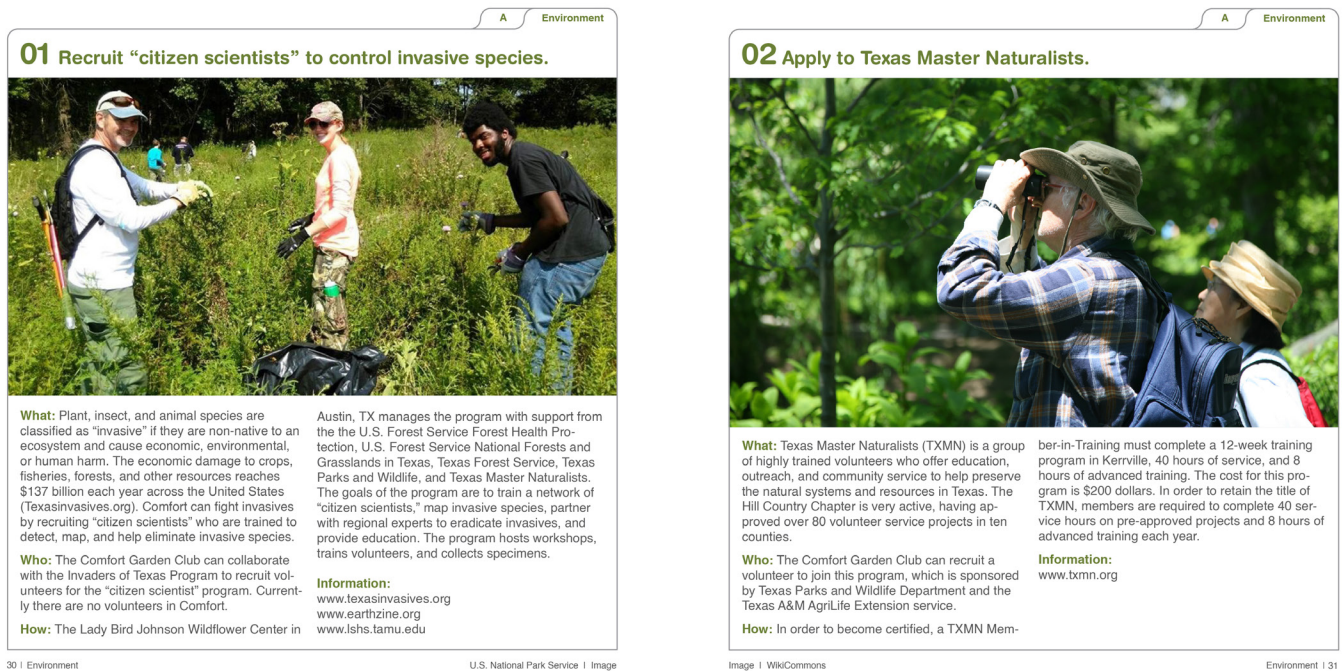


Figure 4. Environmental Initiatives.

must be able to measure, track, and evaluate progress. To facilitate this process, the plan recommends that CAF host a Comfort Vision 2050 Progress Summit on a semi-annual basis to assess progress across the 6 topic areas and 75 Initiatives. Comfort Vision 2050 further recommends that CAF commission a website to track progress via pre-established metrics such as the number of initiatives begun, the number of initiatives complete, and the percentage of progress for each initiative. These efforts will honor self-reliance and the ability of individual residents to exhibit community leadership in the absence of local government.

DISCUSSION: A CASE FOR COORDINATED, DISPERSED REGIONALISM IN THE TEXAS HILL COUNTRY

Solutions to the many challenges that Comfort residents face—from flood water management to water shortages, from the rapid subdivision of land to a lack of affordable housing—clearly reside at the regional scale. Paradoxically, the deep aversion of Texas Hill Country residents to local government could provide a unique opportunity to expand regional cooperation. That’s because in many parts of the United States, a glut of competing local interests and governments make regional cooperation all but impossible. This is not the case in the Texas Hill Country, where local municipalities remain the exception, not the rule. To be sure, well-defined and opposing constituencies do exist. Still, they aren’t typically entrenched in local government, a dynamic that creates a unique opening for regional planning to emerge.

The United States has a long and mixed history of regional planning, much of it grounded in a fundamental critique of city life. In 1898, Ebenezer Howard used the issue of scale to instigate a critique of the city, suggesting that a series of smaller garden cities, limited in size and distance from one another, could achieve a better distribution of population and resources.¹⁸ The early twentieth century saw Lewis Mumford cast further doubt on the ability of metropolitan entities to deal effectively with regional issues, suggesting that “[a]s the metropolis increases in magnitude, it becomes more and more committed to the mistakes of the past, and these mistakes are more and more costly to rectify, even when they have become unbearable.”¹⁹ Like Howard, Mumford favored a “constellation” of smaller cities, held together by a larger organizing regional power with the authority to deal with infrastructural and bureaucratic issues.²⁰ In the mid- and late-twentieth centuries thinkers from Kevin Lynch to Michael Hough echoed this narrative, voicing deep suspicions of large-scale regional efforts, while emphasizing the importance of vernacular responses to the challenges of everyday life.^{21,22} In the late twentieth and early-twenty-first centuries, figures like Peter Calthorpe and David Rusk have advanced a New Regionalism, prioritizing issues of environment, equity, physical design, and place-making.²³ These approaches are notable for their avoidance of large, centralized regional governance and embrace of smaller-scale, cooperative agreements among local governments.²⁴

Such narratives, which privilege geographic dispersion and local control over urban density and metropolitan governance, would likely play well in a place like Comfort, Texas. Still, in order

A Community

64 Celebrate German-Texan and Tejano heritage.



What: Preserve the living heritage of Comfort by adding German-Texan and Tejano heritage events to Christmas for Comfort and Independence Day Celebration events. This would leverage existing festivals to celebrate the diversity of Comfort's cultural traditions in art, food, history, and language.

Who: The Comfort ISD, The Comfort Chamber of Commerce, and the Comfort Heritage Foundation could collaborate on this effort.


How: Organizers can contact the German-Texan Heritage Society and the Tejano Heritage Society to consult and connect organizers with heritage-specific vendors such as baile folklorico groups, German food vendors, and musicians who specialize in classic Tejano music. The Comfort ISD might also get involved, providing local school children with the ability to participate in a living history event.

Information:
www.germantexans.org
www.texastejano.com

138 | Community Pixabay.com · US UCOM | Images

A Community

65 Organize exchanges between local churches.



What: These exchanges allow clergy from different churches to welcome new voices into their pulpits and congregations to host and be hosted by other congregations. The goal here is to deepen community ties and create fellowship between congregations.

Who: This program will require collaboration between at least two churches in Comfort.

How: A single clergy member can initiate the pulpit exchange by inviting the leader from another church to participate in a selected worship. As participation in the program expands, churches can establish a regular rotation or else make the invitations via lottery. Eventually, one congregation can invite an entire congregation to join them for services and fellowship.

Image | Catholic Diocese of Sanginaw Community | 139

Figure 5. Community Initiatives.

to make any of these dispersed models work, residents would have to establish their own definition of regionalism, one robust enough to frame larger policy questions: How can local communities produce a coordinated response to flooding? Who will pay for the required infrastructure? Are land use controls politically sustainable, given the strong support for property rights? How can local communities capture sales tax without a municipal government?

Any attempt at regional governance, of course, begins with a clear definition of region. Architect Vince Canizaro provides a starting point here, asserting that a region is "...a large area with boundaries determined by a range of cultural and natural criteria." Regional criteria can be ecological, political, or cultural, so long as they are critically selected and together give form to a boundary or center.²⁵ This formulation highlights two critical requirements: the first involves establishing a viable scale and the second involves identifying and leveraging political mechanisms capable of managing growth.

The issue of scale is perhaps easiest to address for Comfort residents, as the answer almost certainly resides within the ecological unit of the Texas Hill Country. With well-defined (and well-loved) ecological systems come shared interests, opportunities, and threats. Each has a way of catalyzing discussions and incentivizing collective action. Defining and agreeing on political mechanisms would certainly be more difficult. Currently, governance within the Texas Hill Country is dispersed among eighteen counties. Each has a Commissioner's Court, which consists of a County Judge and four County Commissioners.

The Commissioner's Courts maintain county roads, bridges, policies, budgets, tax rates, contracts, buildings, and facilities. Long-range regional planning is not listed among these responsibilities. To this end, Texas does maintain multiple Government Councils, including five which operate independently within the Hill Country. These voluntary associations of governmental and non-governmental organizations act as a clearinghouse for state and federal funding. They also coordinate planning, research, information, and activities for regions and membership organizations. Still, none of the Government Councils explicitly devote their efforts to regional issues are the scale of the Hill Country.

This doesn't mean that there is a shortage of local actors working on regional issues in the Texas Hill Country. A recent network analysis performed by University of Texas researchers identified 160 organizations that are advancing land and water conservation efforts in the region.²⁶ These organizations range from the Austin Youth River Watch to the Warbler Woods Bird Sanctuary.²⁷ This same report recommends a series of incremental strategies to strengthen the Hill Country network, for example identifying opportunities for non-governmental organizations (NGOs) to collaborate with cities.²⁸ Savitch and Adhikari take a similar view of urban planning in fragmented metropolitan regions, noting the potential for public authorities (corporate entities chartered by government to perform specific functions) to achieve outcomes that localities cannot.²⁹ In this scenario, public authorities function as overlays to the regional system, patching or repairing intractable problems with tangible and immediate solutions.³⁰ In many ways, such

approaches apply the decentralized logic of Comfort Vision 2050 at the regional scale, suggesting a future playbook for unincorporated communities like Comfort. By definition this playbook prioritizes strategies that are situational, issue-based, and incremental while emphasizing targeted collaborations between governmental and non-governmental actors.

To be sure, the future of regional governance in the Texas Hill Country is limited by a general distrust of government and famously weak regulatory structure. Still, these unique political dynamics present communities like Comfort with the opportunity to pursue regional coordination while maintaining local independence. The well-defined geographic boundaries of the Texas Hill Country offer a clear set of shared interests capable of framing regional issues like land use planning, infrastructural investment, aquifer protection, and flood control. The experience of Comfort Vision 2050 suggests that critical opportunities exist at the intersections of these issues, providing unincorporated communities like Comfort with a way to advance local and regional interests simultaneously in the face of otherwise daunting urban growth trends.

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