

Alamo, Austin, and Lone Star chapters of  
the Sierra Club  
Aquifer Guardians in Urban Areas  
Bexar Audubon Society  
Bexar Green Party  
Boerne Together  
Cibola Nature Center  
Citizens Allied for Smart Expansion  
Citizens for the Protection of Cibola Creek  
Environment Texas  
First Universalist Unitarian Church of  
San Antonio  
Friends of Canyon Lake  
Friends of Dry Comal Creek  
Friends of Government Canyon  
Fuerza Unida  
Green Party of Austin  
Headwaters at Incarnate Word  
Hays Community Action Network  
Helotes Heritage Association  
Helotes Nature Center  
Hill Country Planning Association  
Green Society of UTSA  
Guadalupe River Road Alliance  
Guardians of Lick Creek  
Kendall County Well Owners Association  
Kinney County Ground Zero  
Leon Springs Business Association  
Medina County Environmental Action  
Association  
Native Plant Society of Texas – SA  
Northwest Interstate Coalition of  
Neighborhoods  
Preserve Castroville  
Preserve Lake Dunlop Association  
San Antonio Audubon Society  
San Antonio Conservation Society  
San Geronimo Nature Center  
San Geronimo Valley Alliance  
San Marcos Greenbelt Alliance  
San Marcos River Foundation  
Save Barton Creek Association  
Save Our Springs Alliance  
Scenic Loop/Boerne Stage Alliance  
Securing a Future Environment  
SEED Coalition  
Solar San Antonio  
Sisters of the Divine Providence  
Travis County Green Party  
West Texas Springs Alliance  
Water Aid – Texas State University  
Wildlife Rescue & Rehabilitation  
Wimberley Valley Watershed Association  
PO Box 15618  
San Antonio, Texas 78212  
(210) 320-6294

June 3, 2010

Ashley McNabb  
Development Services Department  
City of San Antonio  
PO Box 839966  
San Antonio, Texas 78283-3966

Comments on the Preliminary Draft of the City of San Antonio  
North Sector Plan

Dear Ms. McNabb,

Please accept the comments, to follow, on the Preliminary Draft of the City of San Antonio  
North Sector Plan on behalf of the members of the Greater Edwards Aquifer Alliance.

By and large the Plan included many very good recommendations. The comments to  
follow address mainly areas where we found the Plan to be at odds with the Edwards  
Aquifer Protection Plan endorsed by all of our member groups, as well as  
recommendations for measures that we did not see included in the Preliminary Draft Plan.

I take the liberty of reiterating our position regarding three of the most important issues  
that will be addressed by this Plan.

Specifically, we recommend that the Plan call for increased tree preservation  
requirements on slopes greater than 15% grade as in Austin's Hill Country Roadways  
ordinance. To protect water quality, GEAA recommends no high density development  
allowed on slopes greater than 15%.

GEAA recommends limiting impervious cover (IC) to no greater than 15% within the  
Edwards Recharge Zone (ERZ), and within five miles of the contiguous Contributing Zone  
(CZ). Current IC limits enforced by the City of San Antonio allowing for tiered structure  
tied to land use present the opportunity to develop more and more density in the ERZ and  
Transition Zones, a prospect that we strongly oppose.

Additionally, the U.S. Army has cited concerns about increased impervious cover around  
the base increasing storm water flow that would further compromise their mission. We  
feel that calls to increase density and commercial development within the ERZ and  
CZ surrounding Camp Bullis will result in interference with the Army's mission as well as  
degradation of water quality.

Thank you for your work on this very important Plan, for convening a process that allowed  
for adequate citizen participation, and for the opportunity to submit these comments.

Sincerely,



Annalisa Peace  
Executive Director

**Land Use Goals:**

LU1.4 – Revise CoSA Impervious Cover Limits (IC) to 15% IC, eliminating limitations assigned by land use/zoning designation.

LU1.10 – Require same for Camp Bullis

LU3 – Only if offset on ERZ with land preservation to maintain goal of 15% IC limit

LU3.1 – Exempt Recharge, Transition and Contributing zones within 5 miles upgradient to ERZ from this policy.

LU4.7 – Initiate and implement a [regional watershed land use plan](#)<sup>1</sup> to include Bexar, Comal, Kendall and Medina counties.

LU4.8 – Initiate process for cooperative efforts for Bexar, Comal, Kendall and Medina counties to identify preferred areas for development and preservation to serve as a template for approval of projects within CoSA and ETJ.

**Urban Design Goals:**

UD1.6 – Discourage plans for expanding existing roadways that by-pass or overpass existing business corridors.

UD2.7 – Require [connectivity in street design](#)<sup>2</sup> (gridwork pattern) within new residential developments.

UD2.8 – Utilize riparian corridors as basis for north – south system to accommodate low impact alternative transportation network (pedestrian, equestrian, and bicycle).

UD4 – Urban Design within the ERZ & CZ should utilize [regenerative design](#)<sup>3</sup> and [LID techniques](#)<sup>4</sup> that promote filtration of stormwater runoff on the CZ and filtration and infiltration on the ERZ, and that comply with a stormwater master plan to maximize efficiency of recharge of high quality water into the Edwards and Trinity systems.

**Transportation, Infrastructure and Utilities Goals and Strategies:****Transportation Goals:**

TRAN1.4 - Require [connectivity in street design](#)<sup>5</sup> (gridwork pattern) within new residential developments.

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<sup>1</sup> Center for Watershed Protection. "Rapid Watershed Planning" PowerPoint. January 31, 2004.

<[http://www.co.worcester.md.us/comp%20watershed/CWP\\_watershed\\_planning.pdf](http://www.co.worcester.md.us/comp%20watershed/CWP_watershed_planning.pdf)>

<sup>2</sup> Congress for the New Urbanism. "Building Better Streets Saves Time, Lives, and Money." Accessed June 3, 2010. <<http://www.cnu.org/emergencyresponse>>

<sup>3</sup> Regional Urban Design Assistance Team. "The Boerne RUDAT." June 2008. <<http://rudatboerne.com/>>

<sup>4</sup> American Rivers. "Using Green Infrastructure in Karst Regions." Accessed June 3, 2010.

<<http://www.americanrivers.org/library/reports-publications/using-green-infrastructure-karst.html>>

<sup>5</sup> Congress for the New Urbanism. "Building Better Streets Saves Time, Lives, and Money." Accessed June 3, 2010. <<http://www.cnu.org/emergencyresponse>>

TRAN2.3 - Require [connectivity in street design](#)<sup>6</sup> (gridwork pattern) within new residential developments.

TRAN5.7 – Preserve riparian corridors as basis of low impact routes for alternative transportation (pedestrian and bicycle).

**Utility Goals:**

UT11.2 – ... and preservation of environmentally sensitive land and features.

Or – Utility investments coordinated to avoid compromising ERZ and CZ with growth that could negatively impact our water supplies.

UT11.3 - ...excluding ERZ and CZ and other areas identified as preferred non-development zones.

UT11.5 - Withdraw SAWS permit applications for CCN for water and sewage service within the Edwards Aquifer Recharge and Contributing zone (in north Bexar and Medina counties). If CCN applications are granted, this will require SAWS to provide service to anyone who asks for it within this environmentally sensitive area. Such requirements will negate the latitude currently enjoyed by SAWS to decline service, or negotiate for concessions, for new development that might negatively impact the mission at Camp Bullis.

UT12.4 – Change to 500 year flood plain

UT12.5 - Stormwater runoff on the ERZ should be managed to maximize recharge of high quality water.

**Housing Goals:**

HOU1.1 – We would oppose reduced dedication requirements for park set asides anywhere within this sector.

HOU1.1 - If this is promoting infill development on the Edwards Aquifer Recharge (ERZ), Transition and/or Contributing zones, we strongly oppose any infill development that does not comply with 15% limitation on IC. High density development could be achieved with purchase of ERZ land off site within the same watershed that remains undeveloped, as required to comply with IC limitations.

HOU3.1 – High density housing proximal to UTSA, which is on the Edwards Aquifer Recharge Zone, is inappropriate for this area and should only be endorsed with the requirement for 15% impervious cover limits. High density development could be achieved with purchase land on the ERZ within the same watershed that remains totally undeveloped, as required to comply with IC limitations.

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<sup>6</sup> City of Portland Office of Transportation. "Creating Public Streets and Pedestrian Connections through the Land Use and Building Permit Process." July 2002.

<<http://www.portlandonline.com/Transportation/index.cfm?a=99128&c=36167>>

**Economic Development Goals and Strategies:**

ED1.1 – IH 10 and Loop 1604 – located on the ERZ, habitat of the Golden Cheeked Warbler and Karst Invertebrates, and proximal to Camp Bullis – makes promotion of high density commercial development at this node incompatible with stated goals of aquifer protection, endangered species protection, and respect for the mission at Camp Bullis.

US 281 and Loop 1604 – located on the ERZ and Karst Zone 1 – makes promotion of high density commercial development at this node incompatible with goals of aquifer and endangered species protection.

ED1.3 – Eliminate IH 10 and Loop 1604 corridors and or centers within the ERZ, TZ and CZ from this recommendation (see previous comments).

ED2.1 – Might be achieved with acquisition of off-site land within the same watershed for the purpose of aquifer protection. Would require the implementation of a very tight and specific transfer of development rights (TDR) program.

ED2.2 – We have not been able to find where the SEZs are located. Please make this information available.

ED3.5 – Establish and enforce a no-build buffer zone around Camp Bullis (similar to buffer zone established to accommodate Toyota) to encompass remainder of Camp Bullis Military Influence Area.

ED3.6 - The City could also create a category applicable to the Table of Permitted Uses in the UDC specific to the Camp Bullis Buffer Zone and work with the Army to determine what land uses are not desirable, should be restricted, or require special consideration (i.e. - permitted, not permitted, permitted with defined conditions, conditional upon approval of CC, etc.).

ED3.7 - Increase CoSA Fees in Lieu of Park Set Aside for projects within the Camp Bullis Buffer Zone. Dedicate all fees in lieu of to purchases and easements within the Camp Bullis Buffer Zone.

**Community Facilities and Education Goals and Strategies:**

COM1.8 - Increase ratio of acreage required for park set asides. Increase fee in lieu of payments for required park set asides and require parcels to be identified for purchase (TDR) proximal to proposed new developments.

COM3.3 - Require [connectivity in street design](#)<sup>7</sup> (gridwork pattern) within new residential developments.

**Growth and Expansion of UTSA and other post secondary institutions in the North Sector Strategies:**

EDU1.1 – Expansion of vehicular transportation network could negatively impact the ERZ.

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<sup>7</sup> Congress for the New Urbanism. "Building Better Streets Saves Time, Lives, and Money." Accessed June 3, 2010. <<http://www.cnu.org/emergencyresponse>>

EDU1.2 - Would prefer that expansion of existing and attracting new post secondary institutions to a North Sector location be transferred to west San Antonio, proximal to UTSA Downtown campus, or to A&M campus.

EDU1.3 – UTSA plan should reflect requirements for multifamily housing to meet 15% IC standards on ERZ, TZ and CZ within 5 miles upgradient of ERZ.

**Natural Environment and Historic Resources Goals and Strategies:**

NR1.2 - Revise CoSA Impervious Cover Limits (IC) to 15% IC, eliminating limitations assigned by land use/zoning designation. Adopt IC limit of 20% on CZ 5 miles upgradient of ERZ.

NR1.3 – Identify land appropriate for TDR within watersheds on ERZ and CZ where development is planned to occur.

NR2.6 – Prohibit development on slopes exceeding 15%.

NR3.3 – This is not feasible on the ERZ.

NR3.6 - Require 55% canopy cover on the Edwards Recharge and Contributing zones.

NR3.7 – Where feasible on ERZ, TZ and CZ, CoSA should retain 500 year flood plain in riparian corridors in undeveloped state. This might be achieved through TDR.

NR5.3 - Require all new development within Golden Cheeked Warbler and Karst Invertebrates habitat to submit for take permits prior to plat approval.

NR6 – Protect streams, creeks and watersheds, many of which serve to recharge the Edwards and Trinity aquifers in this region. Retain 500 year flood plain in natural state to maintain water quality and mitigate downstream flooding.