

Alamo, Austin, and Lone Star chapters of
the Sierra Club
Bexar Audubon Society
Austin, Bexar and Travis Green Parties
Bexar Grotto
Boerne Together
Bulverde Neighborhood Alliance
Bulverde Neighbors for Clean Water
Cibola Center for Conservation
Citizens for the Protection of Cibola Creek
Comal County Conservation Alliance
Environment Texas
First Universalist Unitarian Church of SA
Friends of Canyon Lake
Friends of Dry Comal Creek
Friends of Government Canyon
Fuerza Unida
Green Society of UTSA
Guadalupe River Road Alliance
Guardians of Lick Creek
Headwaters at Incarnate Word
Helotes Heritage Association
Hill Country Alliance
Kendall County Well Owners Association
Kinney County Ground Zero
Leon Springs Business Association
Native Plant Society of Texas – SA
Northwest Interstate Coalition of
Neighborhoods
Pedernales River Alliance – Gillespie Co.
Preserve Castroville
Preserve Lake Dunlop Association
Preserve Our Hill Country Environment
RiverAid San Antonio
San Antonio Audubon Society
San Antonio Conservation Society
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
Signal Hill Area Alliance
Sisters of the Divine Providence
Solar San Antonio
Texas Cave Management Association
Trinity Edwards Spring Protection Assoc.
Water Aid – Texas State University
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

**PO Box 15618
San Antonio, Texas 78212
(210) 320-6294**

April 4, 2023

City of San Antonio- Zoning Commission
Development and Business Services Center
1901 South Alamo
San Antonio, TX 78204

Submitted via in-person before 10 AM on April 4, 2023, at 1901 S Alamo

Re: Written Comments for Agenda Item #6- Zoning Case Z-2022-10700194

Please accept the attached comments on behalf of the fifty-five member groups of
the Greater Edwards Aquifer Alliance

1. Background. A request for a change in zoning from "R-6" Residential Single-Family District to "PUD R-5" Planned Unit Development Residential Single-Family District on 11.03 acres out of NCB 14667, generally located in the 7500 Block of Prue Road. Staff recommends Approval.

The property was annexed into the City of San Antonio by Ordinance 79039, dated December 30, 1993, and zoned "R-1" Single-Family Residence District. Under the 2001 Unified Development Code, established by Ordinance 93881, dated May 03, 2001, the property zoned "R-1" Single-Family Residence District converted to the current "R-6" Residential Single-Family District.

2. Greater Edwards Aquifer Alliance (GEAA). GEAA submits the following comments on behalf of our fifty-five member organizations. GEAA is a 501(c)(3) nonprofit organization that promotes effective broad-based advocacy for protecting and preserving the Edwards Aquifer, its springs, watersheds, and the Texas Hill Country that sustains it. GEAA and its members' specific areas of concern are summarized in the following section of this letter.

3. Comments on the zoning case. As noted in the April 4 Zoning Commission Agenda, Zoning Case Z-2022-10700194 will generally be located in the 7500 Block of Prue Road and cover 11.03 acres of NCN 14667. GEAA wishes to raise the following concerns:

- a) **Site Topography:** Examining the Staff Report associated with this Zoning case, it is mentioned that a portion of the subject property is located within the 100yr Flood Plain. Further, from field visits GEAA has conducted with local area residents, steep slopes are observed across the property. Examining contour maps available from the City of San Antonio's Contours & Hydrology GIS Map¹, the property exhibits contour lines as high as 945 ft. on the west side, sloping down to 880 ft. contour lines as you move east towards the existing neighborhood.

¹ <https://gis.sanantonio.gov/PWD/ContourMap/index.html>

According to the City of San Antonio's Unified Development Code (UDC), a steep slope is classified as a slope exceeding fifteen (15) percent. This steep slope classification impacts the total allowable density and net acreage for a PUD development, with the City of San Antonio's UDC stating that "Floodplains (100-year), steep slopes, non-buildable areas, and existing easements are not used to determine net acreage." (Sec 35-344.02)

GEAA understands that the applicant has submitted a site plan that indicates a total of 56 single-family units. Following the City of San Antonio's UDC, the "PUD R-5" designation allows a maximum density of six (6) dwelling units per net acreage; granting a possible 66 dwelling units across this 11.03-acre site if no floodplains (100-year), steep slopes, non-buildable areas, or existing easements were observed on the property. The 56 figure indicates that the 100-year floodplain area observed on the property was taken into consideration; however, GEAA brings into question if the steep slopes observed on the property qualify for the City of San Antonio's UDC steep slopes classification. GEAA urges the Zoning Commission to investigate this issue and adjust the net acreage in accordance with the City of San Antonio's UDC.

b) Water Quality and Flooding Impacts: Examining the Texas Commission on Environmental Quality's (TCEQ) Edwards Aquifer Map Viewer², this project site falls within Edwards Aquifer Transition Zone. However, the project site directly abuts the Edwards Aquifer Recharge Zone to the east (Figure 1) :

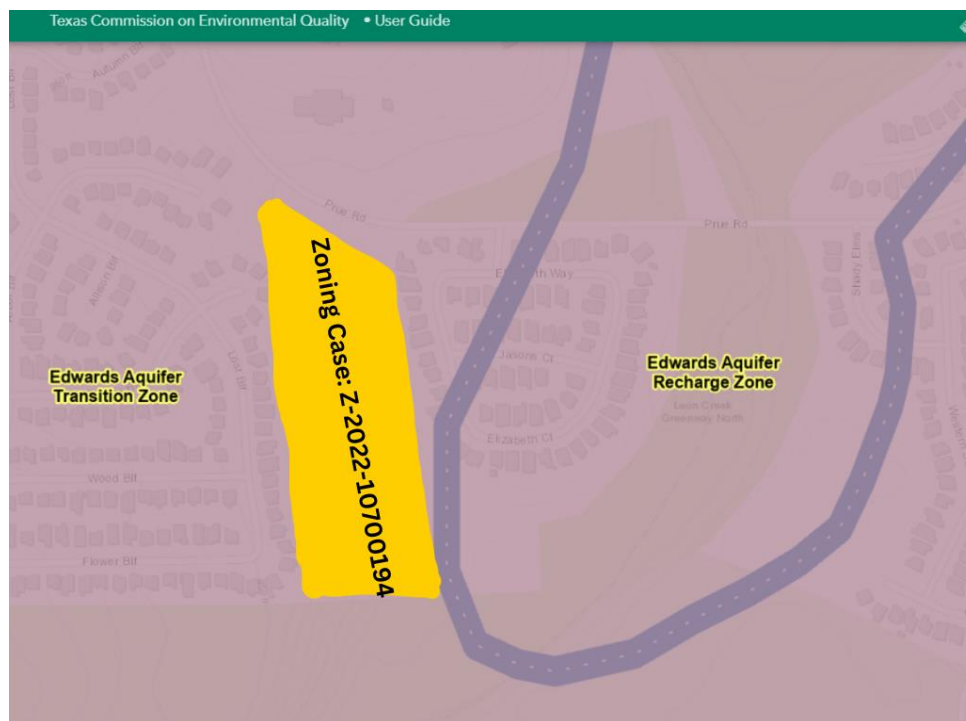


Figure 1: Location of Zoning Case Z-2022-10700194 in Edwards Aquifer Area

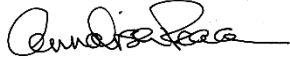
The Transition Zone of the Edwards Aquifer is a thin strip of the Edwards Aquifer area that "transitions" from the recharge zone to the contributing zone. The Transition Zone also contains geologic features, such as faults and fractures, that can provide a possible avenue for the recharge of surface waters to the Edwards Aquifer. The downward gradient of this zoning case raises serious water quality and flooding

² <https://tceq.maps.arcgis.com/apps/webappviewer/index.html?id=2e5afa3ba8144c30a49d3dc1ab49edcd>

concerns to the abutting neighborhood and to the surrounding lands of OP Schnabel Park. GEAA acknowledges that site plans indicate a roughly 31% impervious cover limit is slated for this development; however, this area is already flood-prone prior to any development. GEAA encourages these implications to be taken into consideration and not put the downgradient neighbors and surrounding lands at risk.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Annalisa Peace".

Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance

A handwritten signature in black ink, appearing to read "Nathan Glavy".

Nathan Glavy
Technical Director
Greater Edwards Aquifer Alliance