

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

October 6, 2025

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

*Submitted virtually via email before 4 pm on October 8 to Clayton Wallace,
Planning Coordinator, Clayton.Wallace@sanantonio.gov*

Re: Written Comments for Agenda Item #9 Plan Amendment Case PA-2025-
11600061

Background. A request by KGF PLLC, representative, for approval of a resolution amending the Camp Bullis Extraterritorial Jurisdiction Military Protection Area Land Use Plan, a component of the Comprehensive Master Plan of the City, by changing the future land use classification from “Low Density Residential” to “Community Commercial” on Lot 8, Block 3, CB 4702, located at 8860 Cross Mountain Trail.

Greater Edwards Aquifer Alliance (GEAA). GEAA submits the following comments on behalf of our 62 member organizations. GEAA is a 501(c)(3) nonprofit organization that promotes effective broad-based advocacy for the protection and preservation of 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.

Comments on the zoning case. As noted in the October 8 Planning Commission Agenda, Plan Amendment Case PA-2025-11600061 is an upzoning request for 8.488 acres near 8860 Cross Mountain Trail, which lies within the Edwards Aquifer Contributing Zone.

GEAA endorses the Planning Commission staff’s recommendation of denial of this zoning request due to the proposed “Community Commercial” designation being an incompatible land use in the area. The surrounding area is entirely low density residential and relatively undeveloped (see attached map). The proposed property would be on local roads and not within proximity to major intersections, transit facilities, or existing commercial areas.

The site is located within the Edwards Aquifer Contributing Zone, an environmentally sensitive area better protected by “Low Density Residential” designations in this area than “Community Commercial” designations. Higher density development that could occur in the future if the property is designated “Community Commercial” could lead to a dramatic increase in impervious cover and, possibly, in pollution within this portion of the Edwards Aquifer Contributing Zone and the downstream Edwards Aquifer Recharge Zone.

Additionally, the recommendations for changing the current land use of “Low Density Residential” to “Community Commercial” is inconsistent with Joint Base

San Antonio's efforts to ensure that Camp Bullis complies with the Endangered Species Act for preservation of the Golden Cheeked Warbler.

According to a press release issued by Fort Sam Houston on June 25, 2008, "Our most recent annual species surveys have estimated about 1,100 warblers at Camp Bullis, one of the bigger populations in the Texas Hill Country," said Chris Beck, Natural Resources manager, Directorate of Public Works.

Beck is one of several full-time environmental specialists dedicated to protecting and enhancing natural resources at Camp Bullis. They have the challenge of balancing critical military training missions with a delicate ecological system.

"We work closely with U.S. Fish and Wildlife Service and other environmental agencies to ensure we are doing what we need to do in our conservation efforts," said Beck. "We spend hundreds of thousands of dollars each year directly on conservation measures and research."

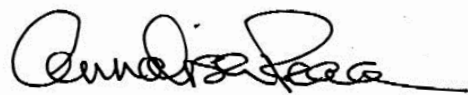
"Included in the measures is the protection of endangered species like the warbler and the lesser-seen black-capped vireo plus three cave invertebrates, or bugs. However, a growing population of endangered birds can be a show-stopper for training in the vicinity."

High impact projects such as this proposed commercial development threaten to compromise the training mission at Camp Bullis by increasing light pollution around the base and potentially increasing endangered species populations on base. They also threaten the integrity of our Edwards Aquifer water supplies, which provide more than half of San Antonio's current supplies.

For the reasons outlined, the Greater Edwards Aquifer Alliance opposes amendments to the Camp Bullis Extraterritorial Jurisdiction Military Protection Area Land Use Plan, including this request from KGF PLLC.

Thank you for the opportunity to submit these comments.

Sincerely,



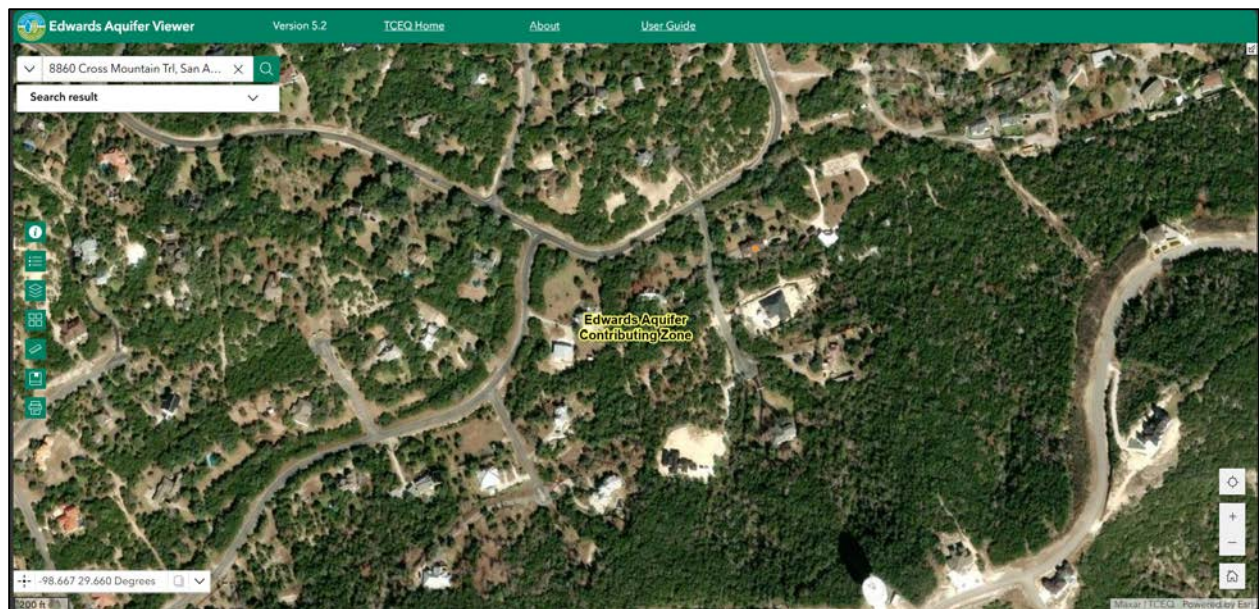
Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance



Rachel Hanes
Policy Director
Greater Edwards Aquifer Alliance

Attachments:

- Map showing property (orange dot) in relation to the Edwards Aquifer Contributing Zone and existing land uses
- June 30, 2008 News Release from Ruth Jones McClendon "Representative McClendon to File House Bill to Protect Military Installations from Real Estate Development Encroachment"
- June 25, 2008 News Release from Fort Sam Houston "Fort Sam dedicated to conservation efforts"



Map showing property (orange dot) in relation to the Edwards Aquifer Contributing Zone and existing land uses

FROM THE OFFICE OF
STATE REPRESENTATIVE RUTH JONES MCCLENDON

For Immediate Release

Monday, June 30, 2008

Contact: Janis Reinken, Chief of Staff

(512) 463-0708



**Representative McClendon to File
House Bill to Protect Military Installations
from Real Estate Development Encroachment**

(San Antonio) -- State Representative Ruth Jones McClendon (D-House District 120, San Antonio), whose House District includes the U.S. Army Post at Fort Sam Houston, is preparing to file a House Bill to help protect areas around military installations across the state from encroachment by residential and commercial developers. The ever expanding communities around these military installations can compromise the missions of the various installations, causing their demise. Information from the City of San Antonio Office of Military Affairs shows that 20 military installations nationwide that have been closed due to this problem since the last two BRAC (Base Realignment and Closure) decisions in 1995 and 2005.

Representative McClendon said, "Community growth is extremely important. It is also quite clear that the state must implement protective measures against encroachment upon our military installations throughout Texas. We must encourage cooperation between private developers, local government, and training facilities, or everyone will suffer. We can accomplish these priorities by emphasizing 'intelligent growth' near our military installations."

Camp Bullis is a sub-installation of Fort Sam Houston and directly tied to its military missions since the field training missions complement the classroom training. Recently, the Camp has felt the heat from encroachment. Last year, Thomas Enterprises, Inc. made plans to develop a 106-acre community near Camp Bullis. However, they agreed to a one-year moratorium and an endangered species habitat study, to allow the City time to investigate how the land should be used in the area. Major General Russell Czerw, Fort Sam Houston Commander, reports that such encroachment would negatively impact the Camp's training missions, especially since the BRAC's 2005 action will increase personnel at Camp Bullis dramatically. The new Department of Defense Medical Education and Training Campus at Fort Sam Houston will increase the Army, Navy and Air Force student population to 9,000. These students will be attending more than seventeen enlisted medical specialty courses.

Representative McClendon served on the San Antonio City Council when the BRAC decision to close Kelly Air Force Base was announced. She said, "Believe me, I understand the sensitivity of protecting our military installations. If the encroachment near Camp Bullis is not addressed, both Fort Sam Houston and Camp Bullis could be in jeopardy." Because of the direct relationship between the two, the encroachment issues at Camp Bullis severely threaten the growth of Fort Sam Houston, which is expecting the influx of an additional 12,000 personnel by 2011. An adverse impact on these installations could be devastating to San Antonio, in light of the U.S. Department of Defense estimates that Fort Sam Houston and Camp Bullis have a \$5.3 billion impact on the area.

The proposed Bill would require developers to notify military installation authorities when construction involves significant tree clearing within a 5-mile radius of the installation. Also, developers and realtors would be required to inform prospective buyers that the property being purchased is adjacent to an active military facility. Additionally, the Bill would require completion of an endangered species survey before developers could begin clearing significant acreage of trees and shrubbery within the 5-mile radius. The area around Camp Bullis is home to 5 federally endangered species such as the golden-cheeked warbler, and overlaps 3 aquifer protection zones.

Camp Bullis relies heavily on night missions, and community lighting could affect these missions. Last year, HB 1852 authored by Representative Frank Corte passed into law, allowing counties to regulate lighting in areas within 5 miles of a military installation. Representative McClendon added, "The development occurring near Camp Bullis raises not only environmental and economic concerns, it has historical implications as well. In order to protect Fort Sam Houston, we must protect Camp Bullis by maintaining a greenbelt area surrounding as much of the facility's perimeter as possible." Camp Bullis was established in 1917.



NEWS RELEASE

June 25, 2008

Fort Sam dedicated to conservation efforts

With about 28,000 acres of predominantly wild landscape, Camp Bullis is a hot spot for military field exercises and battlefield training.

While the range remains a go-to place for realistic training, it recently has gained attention, not of the military nature, but for its work with Mother Nature.

Camp Bullis is not just home to a slew of military training missions, but is also home to five federally endangered species, most notably the golden-cheeked warbler.

The tiny bird, which migrates up from Mexico to Central Texas each year, likes to nest in the old, thick growth of oak and juniper so common on Camp Bullis and the surrounding areas.

“Our most recent annual species surveys have estimated about 1,100 warblers at Camp Bullis, one of the bigger populations in the Texas Hill Country,” said Chris Beck, Natural Resources manager, Directorate of Public Works.

Beck is one of several full-time environmental specialists dedicated to protecting and enhancing natural resources at Camp Bullis. They have the challenge of balancing critical military training missions with a delicate ecological system.

“We work closely with U.S. Fish and Wildlife Service and other environmental agencies to ensure we are doing what we need to do in our conservation efforts,” said Beck. “We spend hundreds of thousands of dollars each year directly on conservation measures and research.”

Included in the measures is the protection of endangered species like the warbler and the lesser-seen black-capped vireo plus three cave invertebrates, or bugs. However, a growing population of endangered birds can be a show-stopper for training in the vicinity.

Part of compliance measures involves designating “core habitat” from warbler observations along with a seasonal (March 1 to Aug. 14) 100-meter light, noise and smoke buffer zone, “meaning increased protection in the areas during the nesting season,” Beck said.

Additionally, the military is restricted to impacting less than 2 acres of trees a year in the areas of occupied habitat.

Of the approximately 28,000 acres at Camp Bullis, about 10,000 acres are identified as potential habitat. Construction at Camp Bullis is therefore concentrated in non-habitat areas to limit the impact on the environment.

Along with the airborne variety, resource managers are also looking to the ground for endangered species, to include the two species of cave beetles and one cave spider at Camp Bullis. These cave bugs seek out deep, dark crevices in underground caves, which also happen to serve as recharge features for the Edwards Aquifer. The aquifer, which is the largest sole-source aquifer in the country, provides water to about 1.7 million people.

“These caves are directly tied to aquifer recharge,” Beck said. “To prevent possible contamination, we have vegetation buffers around these caves that are dedicated to keeping the buffer area as pristine as possible.”

Because these caves occur in the recharge zones, resource managers keep a close eye on the endangered invertebrates that dwell there since their continued existence is just as important on a human level as on an ecological one.

“These invertebrates are an indicator species,” said Beck. “We ensure they are thriving. If they’re healthy, that means the aquifer is healthy.”

As a result of their efforts, the endangered species at Camp Bullis are flourishing. However, a significant increase in the warbler population has been a source of concern — and celebration — in recent years. “The warbler population has increased 50 percent over the past five years calculated on a running three-year average,” Beck said.

Situated in one of the most coveted areas of the city, developers are swiftly closing in on the installation, cutting a wide swath into the forests around Camp Bullis and forcing the warblers to seek refuge on post.

“Endangered species don’t stop at the fence line,” Beck said. “According to longstanding federal law and U.S. Fish and Wildlife Service guidelines, everyone, not just the military, is prohibited from ‘taking’ endangered species.

“The military is a good steward of the environment, as we should all be,” he said. “However, we cannot shoulder the burden of environmental compliance alone. We need the community to help.”

Post leaders continue to work closely with environmental agencies and local and state government officials to protect Camp Bullis from encroachment, Beck said.

According to Jim Cannizzo, an Army environmental lawyer, Fort Sam Houston leaders have called for legislation that would require developers to give notice when construction that involves significant tree clearing, 2 acres and up, is within a 5-mile radius of Camp Bullis. Also, developers and realtors would be required to inform buyers that they are purchasing property adjacent to a busy military facility that may routinely cause noise and other issues.

Finally, the Army would like to see a state law passed that would require developers to conduct an endangered species survey before clearing significant amounts of trees around Camp Bullis, Cannizzo said.

Other efforts under way include a request for counties to require use of dark-sky lighting within 3 miles of Camp Bullis. The lower-intensity lighting is angled toward the ground, making the lighting friendly for next-door neighbors as well as military neighbors.

The goal is to protect Camp Bullis so it can continue serving as a military training ground for the Army, Air Force, Navy and a host of other federal agencies, Cannizzo said, which is a mission directly tied to the continued viability of Fort Sam Houston.

Under the Base Realignment and Closure initiative, the Fort Sam Houston community is slated to grow by more than 11,000 personnel by 2011. The growth is, in part, based on the proximity of Camp Bullis' field training grounds, Cannizzo said.

"The field training area (Camp Bullis), along with a large clinical facility (Brooke Army Medical Center) and medical training facility (Medical Education Training Campus), make Fort Sam Houston a logical choice for centralizing medical training here," Cannizzo said. "But if you knock off one of the legs off the three-legged stool, it collapses."

As post leaders work to protect Camp Bullis from encroachment, the resource managers will continue their efforts with an eye toward the sky, and to the ground.

"We'll continue our work toward ensuring the viability of species here," Beck said. "I think that speaks volumes for the military's dedication to natural resources and conservation."

(Fort Sam Houston Public Affairs Office)