

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