

Alamo Group of the Sierra Club
Aquifer Guardians in Urban Areas
Austin Regional Sierra Club
Bexar Audubon Society
Boerne Together
Cibolo Nature Center
Citizens Allied for Smart Expansion
Environmental Stewardship
Committees of the Episcopal Church of Reconciliation & Episcopal Diocese of West Texas
Environment Texas
First Universalist Unitarian Church of San Antonio
Friends of Canyon Lake
Fuerza Unida
Government Canyon Natural History Association
Hays Community Action Network
Helotes Heritage Association
Helotes Nature Center
Hill Country Planning Association
Guardians of Lick Creek
Kendall County Well Owners Association
Kinney County Ground Zero
Medina County Environmental Action Association
Northwest Interstate Coalition of Neighborhoods
OST 100
Preserve Castroville
Preserve Lake Dunlop Association
Preserve Our Water-Blanco County
San Antonio Audubon Society
San Antonio Conservation Society
San Geronimo Valley Alliance
San Marcos Greenbelt Alliance
San Marcos River Foundation
Santuario Sisterfarm
Save Barton Creek Association
Save Our Springs Alliance
Scenic Loop/Boerne Stage Alliance
Securing a Future Environment
Sisters of the Divine Providence
Smart Growth San Antonio
SEED Coalition
Texas Water Alliance
West Texas Springs Alliance
Wildlife Rescue & Rehabilitation
Wimberley Valley Watershed Association

November 11, 2009

Rod Sanchez
Director, Development Services
City of San Antonio

Tomas Carrasco
Development Services Engineer
City of San Antonio

Dear Mr. Sanchez and Mr. Carrasco,

Please accept these comments regarding revisions to the City of San Antonio Tree Ordinance on behalf of the forty-seven member groups of the Greater Edwards Aquifer Alliance. The Greater Edwards Aquifer Alliance fully supports a goal of 55% tree canopy cover over the Edwards Aquifer Recharge and Transition Zones. GEAA believes the 55% recommendation, set forth in the 2009 Urban Ecosystem Analysis, is necessary to protect a resource that provides drinking water to the majority of San Antonio's residents, and to 2 million people in the region.

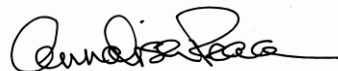
Since these aquifer zones have 55% canopy cover currently, there would be no net increase required as in other areas of the city. At the very least, the city should require this level of canopy cover over the portion of the aquifer within city limits.

We believe that an ordinance that achieves this goal would be within the city's authority, and in conformance with the Texas Real Private Property Act. This belief is based on the fact that the legal counsel for the Edwards Aquifer Authority determined that enforcement of a 20% impervious cover limit would not violate any state or federal laws. Moreover, it was determined that such a requirement would not constitute a taking.

I request that these comments be submitted for the record, and be read as public comment during the meeting of the Tree Ordinance Committee on November 17th.

Thank you so much for this opportunity to submit these comments.

Respectfully,



Annalisa Peace
Executive Director