

September 8, 2016

RE: Comments on City Council Agenda Items 4, 4 A, and 4 B

I am speaking on behalf of the Greater Edwards Aquifer Alliance to request that you vote not to annex the IH10 West and 281 North sites, most of which are currently undeveloped.

The report you were given to inform your decision, *SA Tomorrow Annexation Policy and Strategy Assessment*, made no mention of the concerns voiced by GEAA and a number of others who participated in the Planned Element Working Group on Annexation. The report to City Council made me wonder if I even attended these PEWG meetings, so at variance are its conclusions with what actually was said at the meetings. We resent the wasted hours spent in engaging in these "public input" processes that clearly have a predetermined preferred outcome, and we officially request that you remove GEAA from the list of participants since our concerns were not reflected.

While we respect the arguments for annexation presented by Councilman Gallagher and others, we do not feel that the City will be well served by annexing these two sites on the Edwards Aquifer Recharge Zone.

Currently, the Recharge Zone in San Antonio's ETJ is restricted to 15% impervious cover for all land uses. We find this far more protective than the impervious cover limits inside City Limits, which range from 30% for residential development to allowing up to 85% impervious cover for some commercial developments.

GEAA opposes annexation of these two areas on the Edwards Aquifer Recharge Zone; the action you are considering today guarantees that these areas will be converted to the impervious cover limits that apply within City Limits upon passage.

The *SA Tomorrow Annexation Policy and Strategy Assessment* recommends that "the City should consider establishing adequate measures for site plan review to

ensure that the higher degree of cover does not generate negative impacts, that scaled over a large area, will generate detrimental effects.”

Our major objection to this vote on annexing today is that new ordinances restricting impervious cover to the current 15% limit in the areas proposed for annexation, if passed subsequent to this ordinance approving annexation, will not be worth the paper they are written on. San Antonio’s current water quality ordinances, passed in January 1995, are still being flouted as developers claim vested rights exemptions from the ordinances – over twenty years after they were passed. If City Council annexes the IH 10 West and 281 North parcels without first passing water quality protections limiting impervious cover, the result will be a flood of development applications - insuring that this land will be exempt from the governance of any subsequently adopted ordinances for the next twenty years.

The Greater Edwards Aquifer Alliance considers this rush to annex the IH 10 West and 281 North parcels – the only sites proposed for annexation that lie over the Edwards Aquifer Recharge Zones - to be the direct result of undue influence of vested interests who will prosper from unfettered high density development in this environmentally sensitive area. We resent the charade of engaging “citizen input” in a process that did not reflect our concerns.

Honestly, were it not for San Antonio’s screwy impervious cover regulations, we would not have a dog in this fight. We are put in the position of opposing these annexations, normally a good thing, because of a corrupt process that took place in 1995, resulting in a set of water quality ordinances for San Antonio that have largely proved useless. Bottom line, if the IH 10 West and 281 annexation plans are approved, we can count on an explosion of growth over the Edwards Aquifer Recharge Zone in the annexed areas.

Consequently, the rest of the city will suffer. Initial research conducted by GEAA staff examining five sites has discovered two Stormwater mitigation projects on the Edwards Aquifer Recharge Zone paid for by the city because drainage plans submitted by developers and approved by the City were insufficient to prevent flooding. We suspect that all City taxpayers are subsidizing development on the

EARZ all too frequently. We predict that all citizens of San Antonio will be paying higher taxes if high density development comes with this annexation.

We are grateful to Councilwoman Shirley Gonzales for bringing up concerns about the cost of City services and concerns about adding new suburban growth rather than concentrating CoSA's resources within the inner city at your B Session discussion. We wholeheartedly agree with Councilwoman Gonzales when she observed, "When we consider the City we want to be, I just don't see how that annexation fits into that picture."

Also at that B Session, Councilman Saldana mentioned that the neighborhoods excluded from annexation were organized and hired lobbyists. Wouldn't it be wonderful if GEAA could have hired one of the well-connected lobbyists to represent the Aquifer on this issue?

There is no measure that can register my disgust with this process. That you are excluding existing neighborhoods from the 281 North area gives the appearance that you are annexing a considerable amount of undeveloped acreage in order to boost impervious cover in the areas to be annexed. We see no reason to fast track this annexation when our primary source of water is involved - especially given the poor quality of the report meant to inform you on this issue. Please - vote no on Agenda Items 4A, and 4B – or postpone action on these agenda items until the SA Tomorrow committee charged with considering limits on impervious cover has issued recommendations.

Thank you.