

**City of San Antonio**  
**Office of the City Council**  
**Interdepartmental Correspondence Sheet**

TO: John Dugan  
FROM: Ron Nirenberg, Councilman, District 8   
COPIES TO: Mayor Taylor, Sheryl Sculley, Peter Zanoni, City Council  
SUBJECT: Implications of Annexation to Impervious Cover  
DATE: September 11, 2015

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As we execute our annexation plan, we need to address a serious policy concern regarding impervious cover.

Thank you for your efforts to ensure as smooth a process as possible for annexation. A compelling reason for pursuing annexation is careful management of future economic and natural resources, including water. The backbone of this effort is the protection of the Edwards Aquifer watershed, which accounts for the vast majority of our current and future water supply. In May, voters overwhelmingly approved a commitment to continuing longstanding efforts to do so.

The development of land above the Edwards Aquifer Recharge Zone is managed, in part, by the City of San Antonio Water Quality Ordinance in Chapter 34 of the City Code. Certain provisions of this ordinance delineate how much impervious cover is permissible for developments within the City Limits and for developments within the extraterritorial jurisdiction (ETJ). Significantly more impervious cover is currently permitted within the City Limits than the ETJ.

If annexed, the impervious cover limitations for single-family residential development would increase from 15% to 30%, limitations for multi-family residential development would increase from 15% to 50%, and limitations for commercial development would increase from 15% to 65%.<sup>1</sup> There is a growing concern that annexation would lead to the proliferation of dense development that would not be currently permissible and would endanger the water quality and quantity.

Please consider the adverse impacts that annexation could cause given this legal landscape and develop recommendations to close this loophole. Failure for us to do so before annexation of these areas would be counterproductive to our affirmed annexation strategy.

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<sup>1</sup> City Code, Sections 34-930 & 34-935