

ALLIANCE FOR SAN ANTONIO MISSIONS

Colleen Swain
Director, World Heritage Office
City of San Antonio

Via email to colleen.swain@sanantonio.gov

July 27, 2016

OPEN LETTER COMMENTING ON “PROPOSED FUTURE LAND USE AMENDMENTS IN WORLD HERITAGE AREA”

Dear Ms. Swain,

This letter responds to the request for input on the proposed land use amendments in the City of San Antonio’s designated World Heritage Area.

As you know, the Alliance for San Antonio Missions is an all-volunteer community-based group. Currently, the majority of our 300+ members reside in the neighborhoods around the four Missions on the Southside. The comments provided below reflect the major points that are repeatedly discussed in our meetings.

While we regret that you have so far declined the invitation to meet with our group, we remain open and available to discuss these comments and continue to hope to have an opportunity to share directly with you some of our ideas for smart development that will help strengthen our communities while preserving and enhancing the experience of our shared and irreplaceable World Heritage.

Thank you for your consideration.

Sincerely,

Carroll Brown
Secretary
Alliance for San Antonio Missions
info@allianceforsamissions.org

cc:

Mayor Ivy R. Taylor mayor.ivytaylor@sanantonio.gov

Sheryl Sculley citymanager@sanantonio.gov, sheryl.sculley@sanantonio.gov
Roberto C. Treviño district1@sanantonio.gov
Alan E. Warrick, II district2@sanantonio.gov
Rebecca Viagran rebecca.viagran@sanantonio.gov
Rey Saldaña rey.saldana@sanantonio.gov
Shirley Gonzales shirley.gonzales@sanantonio.gov
Ray Lopez ray.lopez@sanantonio.gov
Cris Medina cris.medina@sanantonio.gov
Ron Nirenberg district8@sanantonio.gov
Joe Krier district9@sanantonio.gov
Mike Gallagher district10@sanantonio.gov

Comments by Alliance for San Antonio Missions on “Proposed Future Land Use Amendments in World Heritage Area”

Overall Comments

Before addressing specific bullet points in the document, here are some comments on the proposed Amendments overall:

- 1) **Community Engagement and Information** We appreciate the effort to reach out for more community engagement and with more informational materials, including the new World Heritage page on the City website. We also continue to believe outreach could be done even more effectively and materials could be improved, and we remain willing to help.
- 2) **Designation of the “World Heritage Area (WHA)”** There is still considerable confusion about the extent of the WHA. This may be in part because the official zone does not always track topographical and historical features, and sometimes includes only one side of major streets. We hope that good urban planning will ensure that the boundary of the WHA does not become a line of demarcation promoting the perception of a ‘World Heritage theme park’.
- 3) **Funding** Many of the suggestions in the document are big budget items. We need to know more about proposals for paying for these items before they can be realistically evaluated and prioritized. For example, if there is not funding for both, would San Antonio prefer to “Establish greenway linkage from Gilbert Elementary to the San Antonio River” or “Consider greenway corridor along Padre Drive, with demonstration garden adjacent to River”, both currently bulleted under the South Central Community sector Plan? Might San Antonio prefer to budget for something else entirely, such as “Install improvements to Stinson Park and Brown Park, with more landscaping desired along San Antonio River”, under the Stinson Airport Vicinity Plan?

The Alliance has already made some suggestions for funding and tax and other incentives for desirable development. (Please see the commentary published in the Rivard Report, February 10, 2016 "[New Ideas for San Antonio's World Heritage](#)".) We would like to hear more discussion about budget allocations and funding sources from San Antonio's political leadership.

4) ***Specificity and Actual Planning*** The proposed Amendments contain many excellent suggestions which we appreciate are intended to offer general and possibly even aspirational guidelines. For example, there are repeated references to open and green spaces and to pedestrian linkages. In the abstract, we doubt few would object to these great-sounding ideas. Our concern is that local communities be more substantively involved in actual planning, especially where public funding is involved.

5) ***Eminent Domain and Displacement*** There is considerable anxiety within our communities about the possible use of eminent domain, and the predictable rise in speculative development and/or property valuation that could drive displacement. We request that these topics be addressed specifically in future public events. Again, we are happy to help plan any such event.

6) ***Adoption of the Proposed Amendments and Zoning*** We would like more information about the process and the timeline for implementation of the proposed Amendments. Will approval of these proposed Amendments be decided by a City Council vote? If so, when will that vote take place? Will there be any citizen referendum process? The accompanying document "Future Land Use in Neighborhood and Community Plans" states "future rezoning must be consistent with the Land Use Plan". Will future zoning exceptions and variances will be considered any differently for the WHA?

Also, it is not clear how these proposed Land Use Amendments would interact with the SA Tomorrow Comprehensive Plan.

Specific Comments

Copied below are the portions of the proposed Amendments on which we have specific comments. We have focused on the General Themes because they underpin the entire document. Consequently our comments on the General Themes are applicable to many individual bullets under each community plan section. Because the Amendments include significant overlap among the four community plans addressed, in order to avoid useless duplication we have confined specific comments to certain unique portions excerpted from each of those sections.

Our comments are indicated in bold italics. In connection with all of the bulleted points below, please also see our general comments above.

General Themes

Parks/Open Space and Pedestrian Linkages

- Explore opportunities for green space and agriculture/community gardens; ensure appropriate buffers near Missions through acquisition of property or conservation easements.

What is an “appropriate buffer”? We continue to think that the existing Missions Protection Overlays Districts should be revised, and that viewshed protections alone are inadequate.

We support the acquisition of particularly sensitive properties, and can specifically offer the example of the L&H property immediately adjacent the Mission San Jose site on Roosevelt Avenue.

We previously have suggested the City inventory and identify such sensitive properties for possible acquisition, perhaps using 2017 Bond funding. Until this is done and there is an open discussion of the various proposals for use and development of such sites that are circulating among our communities – and we are sure there are more proposals of which we are not aware – we do not think it is possible to move this conversation forward with true public engagement. We call on the City to open this important dialogue now, as plans for the 2017 Bond rapidly evolve.

- Landscape major corridors such as Alamo, St. Mary’s, and Roosevelt.

We appreciate sensitive landscaping. We do not need high-maintenance landscaping. We also see no compelling reason to build more hardscaping such as the brick pavers along some of the Mission Trail corridor that require constant upkeep (and often do not receive it) and do little other than add some debatable ‘brand’ identity. We would prefer to see money spent on getting shade over every bus stop in District 3.

- Create pedestrian linkages from schools, neighborhoods and business districts to the San Antonio River.

Safe urban walking is good. Certain areas of District 3 should have had sidewalks long ago. How will creation of new pedestrian linkages be prioritized? Should they all be funded by the City, especially when some inevitably will deliver traffic to certain businesses, and necessarily direct traffic away from others? Might there be appropriate development partners?

Development

- Development should be high quality and feature an authentic theme.

What is an “authentic theme”? We do not want to encourage Disneyfication or fetishize any particular historical architectural style.

We have read the UNESCO documentation, and believe there is a much deeper conversation to be had about “authenticity” here. Our communities would welcome this level of engagement.

- Ensure traffic capacity and parking is adequate for more intense mixed use developments.

We would like to see even more support and incentives for public transportation and biking as alternatives to individual vehicular traffic. We can suggest time-sharing existing paved lots in order to help minimize impervious cover. We would also like to see incentives for working with local “green” organizations and developers.

Particularly around Mission San Jose but also around Espada and San Juan, there is already a need to rethink traffic flow and possible street closures and re-routings. We have only seen suggested street re-namings so far. When will this kind of discussion take place publicly?

- Ensure adequate supply of affordable housing – both single and multi-family.

How are we going to measure and if necessary put limits on demand, particularly in areas closest to the Missions and to the River?

We also need to talk about how the WHA and adjacent housing supply stacks up against demographic distribution across the City.

- Provide adequate setbacks and buffers to the San Antonio River in the design and construction of new communities.

What are “adequate setbacks and buffers” and who will define them? We do not want to see Mission Reach become a canyon. Does San Antonio want to build ‘Riverwalk South’, or are we trying to do something different along Mission Reach?

- Discourage high density residential development in close proximity to the Missions. [

We need to define “close proximity”, and would then suggest prohibiting and not merely discouraging any high-density residential development.

We also would like to hear some discussion of sound and light pollution.

- Discourage gated communities that could negatively impact connectivity to the San

Antonio River.

The public needs to be better informed about rights of access to the River, and any development that negatively impacts rights of access should be prohibited.

- Expand small scale commercial opportunities along the San Antonio River, facing the trail.

Please see above: What are “adequate setbacks and buffers” and who will define them?

What is “small scale”? Are we talking physical dimension or low traffic impact, both, or something else entirely?

We suggest exploring a concession model to help level access to certain commercial opportunities where possible and appropriate, for example on City or County-owned or controlled land. Without unduly damaging private property interests, it may be socially beneficial to concentrate needed commercial goods and services in a few places in order to preserve as much of the open space along the River as possible. After all, public money created the current commercial opportunity. World Heritage designation and the development of the Mission Reach should not become a windfall for a few private property owners, at any scale.

- Improve commercial development opportunities along corridors; address the proliferation of tire shops and other intense auto related uses through zoning and screening.

We need smart development and that includes more diverse business development.

We believe if development first serves the local residents, it will also serve World Heritage tourism.

Meanwhile, we have heard very little further about the concept of supporting “heritage” or “legacy” businesses that has been mentioned at a couple of City-organized events. What does this mean? We understand there is some study of existing businesses underway with UTSA. When will we hear more?

- As industrial uses vacate, convert to mixed use.

Or downzone to open or green space. Any recommendations for zoning conversions need to be considered on a case-by-case basis. This can only be done with an inventory of existing properties.

South Central Community Plan [excerpted]

- Install more visitor amenities and parking along San Antonio River and Missions.

Again, we would like to highlight the need for a deeper and more open public conversation about the investment and return on investing in visitor amenities.

- Consider more residential density along S. Presa St., Mission Rd., and near the VFW.

We do not hear residents asking for more housing density in these areas. Can you provide numbers for these suggestions?

Rather than residential, we have heard several suggestions for retail, professional and cultural amenities for areas on Mission Road and the VFW site in particular.

Stinson Airport Vicinity Plan [excerpted]

- Encourage mixed use development at Roosevelt and Loop 410.

Particularly in areas of current low but long-term residential density, we think more outreach needs to be done to ensure that the community is truly engaged and aware of proposed development plans.

Heritage South Sector Plan [excerpted]

- Provide opportunities for shuttle bus, refreshments, gift shops and small business near Loop 410 and in proximity to Mission Espada.

Again, particularly in areas of current low but long-term residential density, we think more outreach needs to be done to ensure that the community is truly engaged and aware of proposed development plans.