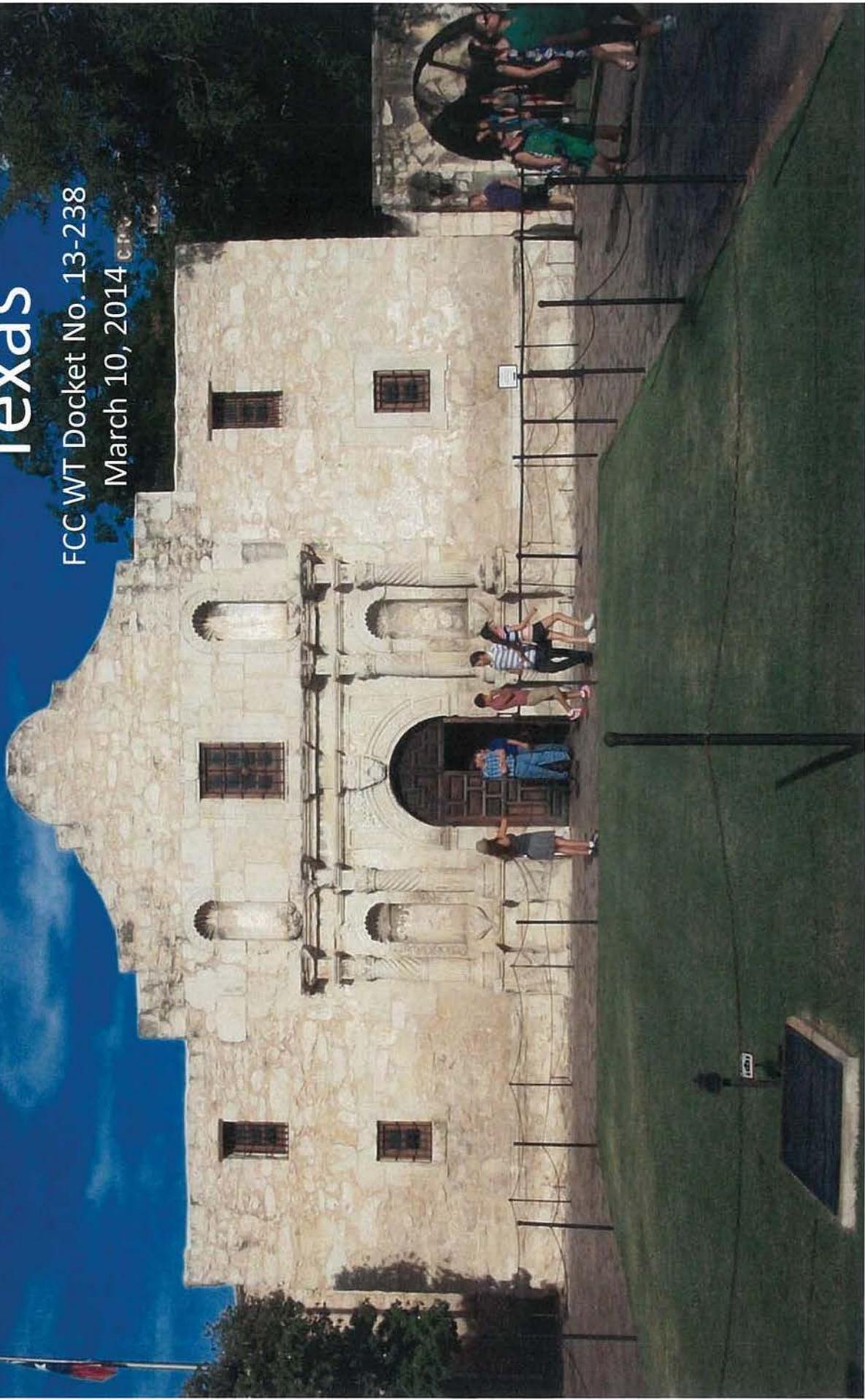


# City of San Antonio, Texas

FCC WT Docket No. 13-238

March 10, 2014 CRV



# San Antonio Recognizes the Importance of Wireless and Broadband Deployment

- The City has granted 100s of collocation requests in the last 3 years, alone
- The City has approved the installation of DAS and small cells
- The City leases City-owned property for tower siting and collocation in all zones, including residential zones
- Subject to building code and other public safety requirements, the City permits new wireless facilities and collocations as of right in industrial and non-historic commercial zones

# Rich Historic Resources

- Including—
  - Over 2000 individual landmarks
  - 27 different locally designated historic districts
  - 19 sites on the National Register of Historic Places
  - Designation of 5 historic missions as UNESCO World Heritage Sites pending
- San Antonio is a popular tourist destination with over 28 million visitors each year
- City subjects alterations (including wireless facilities) in historic and riverfront areas to review and approval



# San Antonio River Walk



The elevator in the background is the location of a small cell tower, approved through the City's review process.

# St. Paul Square



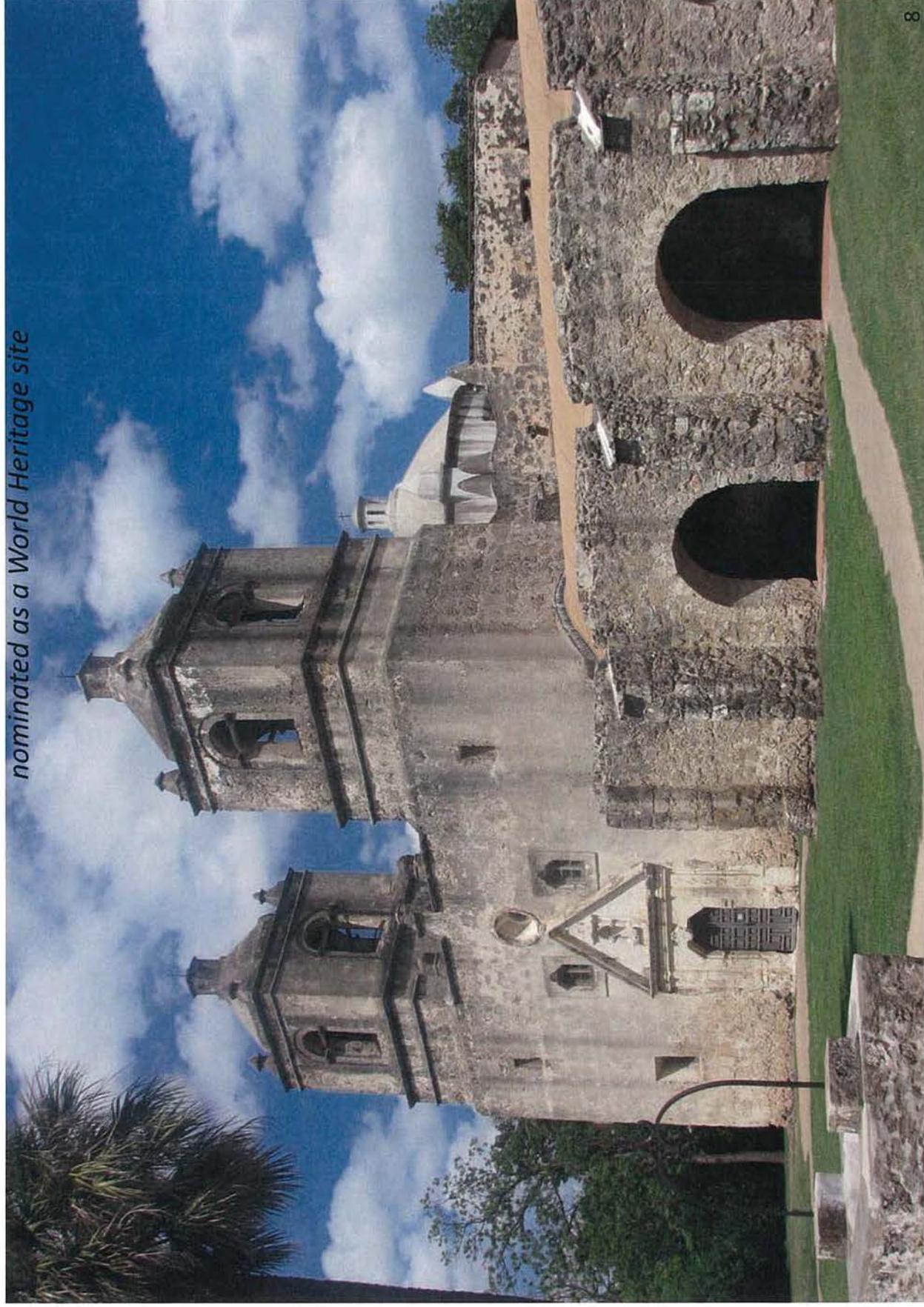
A commercial historic district.

# River Walk Museum Reach



# Mission Concepcion

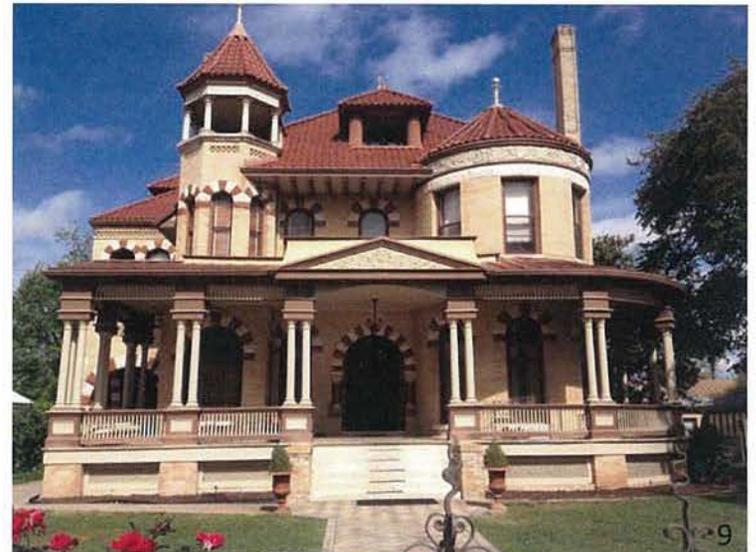
*nominated as a World Heritage site*



# Homes in Primarily Residential Historic Districts



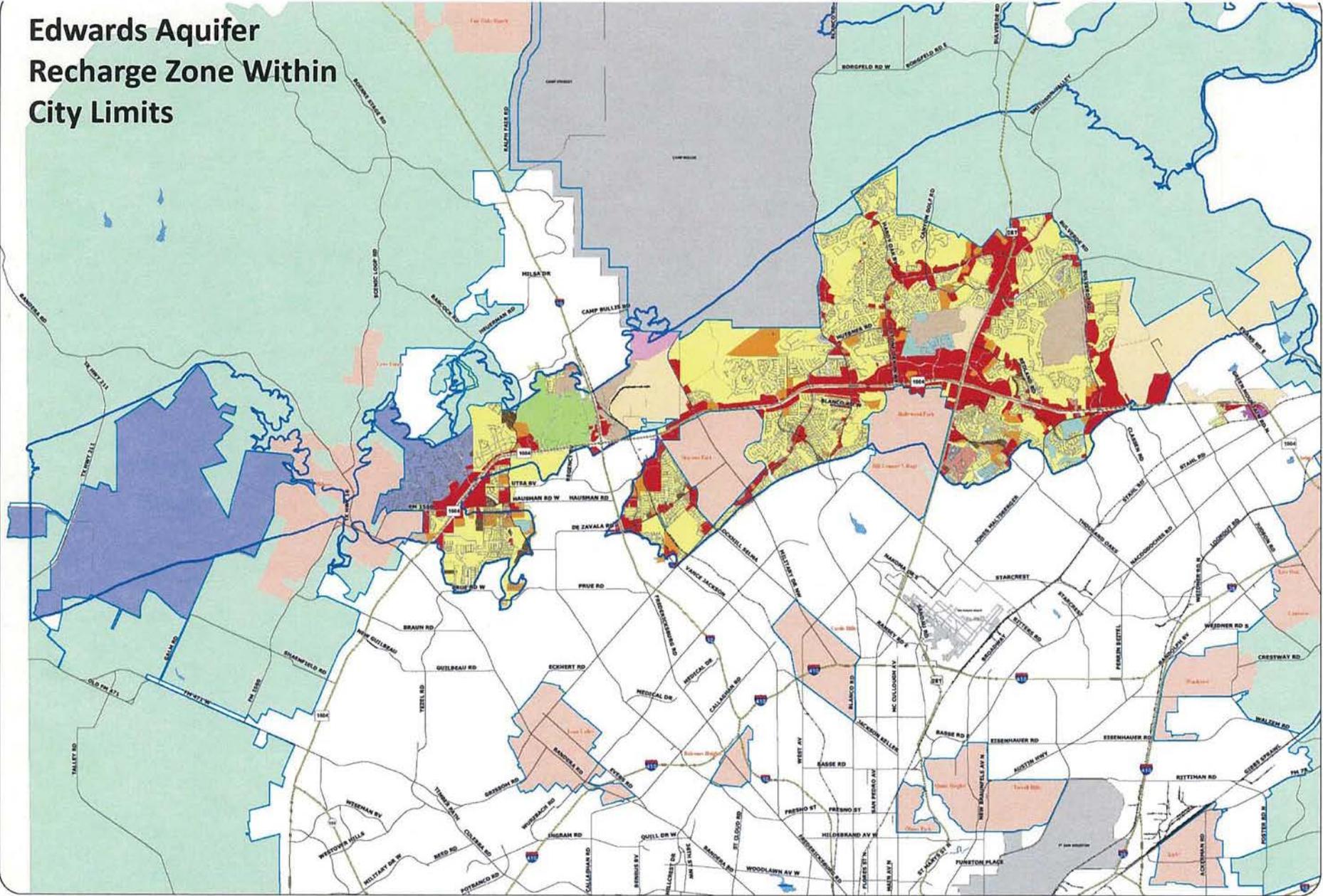
*Historic districts are typically created through a public process and result from a great community effort to protect an area.*



# Environmental and Public Safety Concerns

- Edwards Aquifer: the City's primary water source
  - Edwards Aquifer Authority (Texas agency)
  - San Antonio City Code--imposes conditions on all developments in Aquifer Recharge Zone to prevent leakage into Aquifer
- Tower heights, set backs, and safety analyses protect persons and property from potential injury and damage from a falling tower

# Edwards Aquifer Recharge Zone Within City Limits



- |                           |                      |               |                          |                           |                          |                     |                               |
|---------------------------|----------------------|---------------|--------------------------|---------------------------|--------------------------|---------------------|-------------------------------|
| Residential Single-Family | Residential Estate   | Commercial    | Office                   | Military Reservation      | Planned Unit Development | City of San Antonio | Military Bases                |
| Residential Multi-Family  | Manufactured Housing | Business Park | Industrial               | Neighborhood Commercial   | Resource Protection      | Cities and Towns    | Lakes                         |
| Residential Mixed         | Development Reserve  | Entertainment | Master Planned Community | Neighborhood Preservation | Quarry                   | Bexar County        | Edwards Aquifer Recharge Zone |

## City of San Antonio ERZD Zoning District.

# Conclusion

- San Antonio has successfully balanced widespread wireless and broadband deployment with the preservation of historic, cultural, and environmental resources and the protection of public safety
- The FCC should not construe Section 6409(a) to inhibit the City's ability to impose historic preservation, environmental protection, or public safety conditions on wireless facilities projects