



DEVELOPMENT SERVICES

RULE INTERPRETATION DETERMINATION

Determination #: 2025-002

Title: *Delivery Drone Station*

Drafted by: *Land Development Division, Zoning Section*

Rule in Question: *Sec. 35-311 Use Regulations and Division 7 Accessory Uses*

Department Action: *This RID is for clarification purposes and includes suggested UDC amendments.*

Michael Shannon, PE, CBO
Development Services Director

4-11-2025

Date

Effective Date of Determination: *Immediately*

Please note RIDs often result in direct or related UDC amendments to codify the clarification addressed within the RID. RIDs can also be superseded by subsequent RIDs or UDC amendments. The Development Services Department will remove RIDs from the website when they are no longer valid.

Staff Analysis: This RID is a customer and staff clarification effort to address issues relating to emerging express delivery services and to acknowledge the associated materially similar interpretation and proposed processes for classification and permitting.

"Drone Delivery Station" is not a current use in the UDC however, staff considers the UDC classification of "Heliport" to be the most materially similar use to the emerging activities related to drone delivery services.

Section 35-A101, Appendix A, defines Heliport as follows:

Heliport. That area used by helicopters or other steep gradient aircraft for take-offs and landings. Such area may include passenger, cargo, maintenance and overhaul facilities, plus fueling service, storage space, tie-down area, hangars and other accessory buildings and open spaces.

In essence an area used for aircraft take-offs and landings and is further regulated in Chapter 3 Airports, Article III Heliports, Helistops.

Per UDC, Section 35-311 Use Regulations, Table 311-2 Nonresidential Use Matrix, a heliport is permitted as follows:

TABLE 311-2 NONRESIDENTIAL USE MATRIX												
	PERMITTED USE	O-1 & O-1.5	O-2	NC	C-1	C-2	C-3	D	L	I-1	I-2	ERZD
Transportation	Heliport (see also Chapter 3 City Code)		S					S		S	S	S

Staff Position and Interpretation:

It is Staff's position that a Drone Delivery Station is materially similar to the use of a heliport, and thus a Drone Delivery Station also merits zoning review through the Specific Use Authorization process. Staff recommends *Drone Delivery Stations* be permitted with an "S" Specific Use Authorization in the "C-3" Commercial District, "L" Light Industrial District, and "I-1" General Industrial Districts, and subject to the following proposed Supplemental Use Regulations to be listed in Division 7 of Article 3 in Chapter 35:

- Each Drone Delivery Station shall be utilized in conjunction with a warehouse and/or distribution center.
- A Drone Delivery Station is subject to Section 35-311 and Specific Use Authorization regulations.
- If a Specific Use Authorization is granted all required permits must be obtained and the business classification shall be updated to include the Drone Delivery Station.
- Drone Delivery Stations are subject to any City of San Antonio Noise Ordinances.
- Drone Delivery Stations shall meet all Federal Aviation Administration (FAA) and National Aerospace System (NAS) requirements for operation.

Future UDC Amendments:

To codify this interpretation, staff suggests the following UDC amendments, including a definition of *Delivery Drone* and *Drone Delivery Station* in Appendix A, inclusion of the classification in the Permitted Use Table, and specific additional language in Supplemental Use Regulations:

Appendix A Definitions:

Delivery Drone - A delivery drone is a type of unmanned aerial vehicle (UAV), or unmanned aircraft system (UAS), that operates autonomously or by remote control and is used for delivery, distribution, or transport of products and packages. Delivery drones are regulated by the Federal Aviation Administration (FAA).

Delivery Drone Station - The specialized location, which may include a building, structure, or area of land, from which delivery drones land and take off remotely or autonomously. The delivery drone station may be used for takeoff, landing, drone staging, storage, recharging, repair, maintenance, or other related activities as allowed. All operations conducted from a delivery drone station must comply with applicable FAA approvals and federal regulations.

Table 311-2 Non-Residential Use Matrix

TABLE 311-2 NONRESIDENTIAL USE MATRIX												
	PERMITTED USE	O-1 & O-1.5	O-2	NC	C-1	C-2	C-3	D	L	I-1	I-2	ERZD
Transportation	Drone Delivery Station (Subject to 35-398.02)						S		S	S	S	

Division 7: Supplemental Use Regulations

Section 35-398.02 – Drone Delivery Station.

- (a) Generally. Where permitted pursuant to 35-311 and a Specific Use Authorization, Drone Delivery Stations shall comply with the following:
 - (1) Each Drone Delivery Station shall be utilized in conjunction with a warehouse and/or distribution center.
 - (2) Where Specific Use Authorization is granted, all required permits must be obtained, whether city, state or federal.

- (3) Drone Delivery Stations are subject to all City of San Antonio Noise ordinances.
- (4) Drone Deliver Stations shall meet all Federal Aviation Administration (FAA) and National Aerospace System (NAS) requirements for operation.