

**SAN ANTONIO WATER SYSTEM**  
**Interdepartment Correspondence Sheet**

**To:** Zoning Commission Members

**From:** Scott R. Halty, Director, Resource Protection & Compliance Department,  
San Antonio Water System

**Copies To:** Andrew Wiatrek, Manager, Edwards Aquifer and Watershed Protection Division,  
Michael Barr, Supervisor, Aquifer Protection and Evaluation Section, Michael A.  
Escalante, Environmental Protection Specialist III

**Subject:** Zoning Case Z2024-10700181 (Santikos Legacy MF-33)

**Date:** September 26, 2024

**SUMMARY**

A request for a change in zoning has been made for an approximate 10.281-acre tract located on the city's north side. A change in zoning from **"C-3 S MLOD-1 MLR-2 ERZD & C-3 MLOD-1 MLR-2 ERZD"** to **"MF-33 MLOD-1 MLR-2 ERZD"** is being requested the applicant, Sanitkos Legacy, LLC and represented by Killen, Griffin, & Farrimond, PLLC. The change in zoning has been requested to allow for a multi-family residential development. The property is currently classified as a Category 1.

Based on the site evaluation of the property, and the information submitted by the applicant, SAWS staff recommends **approval** of the proposed land use. Should the City Council rezone the property that is the subject of this report, the San Antonio Water System recommends that any development on that property after the zoning classification has been changed should be restricted as stated in the environmental recommendations section of this report.

**LOCATION**

The subject property is within City Council District 9, located approximately 1,800-feet eastside of US Hwy. 281 North and Sonterra Blvd. intersection. The property lies within the Edwards Aquifer Recharge Zone (Figures 1 and 2).

**SITE EVALUATION**

1. Development Description:

The proposed change is from **"C-3 S MLOD-1 MLR-2 ERZD & C-3 MLOD-1 MLR-2 ERZD"** to **"MF-33 MLOD-1 MLR-2 ERZD"** will allow for a multi-family residential development on 10.281-acre tract. Currently, the site is undeveloped with groundcover vegetation and native trees throughout the tract. An existing water quality basin located in the southeast portion of the site treats stormwater run-off from the retail shopping center located south of Sonterra Blvd., through an underground drain, and doesn't treat the subject site. The existing water quality basin on-site was found to be compliant at the time of the SAWS site evaluation. The project will consist of townhomes with associated parking area.

2. Surrounding Land Uses:

Ridge Wood business center is located north of the project. The Legacy retail center sits to the south and west of the site. Redland Ridge neighborhood lies to the east of the tract.

3. Water Pollution Abatement Plan:

A WPAP filed under the name Palladium Subdivision had been previously submitted and approved by the Texas Commission on Environmental Quality (TCEQ) on November 12, 2002. An existing water quality basin associated with the WPAP, located north of the subject site will treat stormwater run-off from the site, and was found to be compliant at the time of our site evaluation. Further review of the inspection and maintenance history shows the basin in compliance since 2021.

4. Geologic Conditions:

The San Antonio Water Systems Aquifer Protection & Evaluation Section conducted a site evaluation to assess the geological conditions and to determine if environmental concerns are present. Mr. Justin Turknett, a Professional Geoscientist (P.G.) and a San Antonio Water System geologist, performed site visits on July 26, 2024, and August 6, 2024. Prior to the site visits, a Geological Assessment dated July 2, 2002, was reviewed. The Geological Assessment did not identify geological sensitive features at the site.

The site is approximately 10.281 acres. The site is bounded by vacant land to the north and east, a road (East Sonterra Boulevard) to the south, and a large sand filter basin to the west. The site is undeveloped with thick vegetation. According to historical aerials and confirmation in the field, fill material covers the majority of the site. The site slopes to the eastern boundary towards Mud Creek. Mud Creek runs parallel with the site along the eastern boundary.

According to the Federal Emergency Management Agency (FEMA) Flood Map 48029C0255G dated September 29, 2010, the eastern portion of the site is within the 100-year floodplain.

According to the United States Geological Survey (USGS) Water Resource Investigations Report 95-4030, the western edge of the site is mapped on the Leached and Collapsed member of the Person Formation associated with the Edwards Group, the west central portion of the is mapped on the Regional Dense member of the Person Formation, and the central to eastern portion of the site is mapped on the Grainstone member of the Kainer Formation.

The Leached and Collapsed member is approximately 70 to 90 feet thick. The lithology consists of crystalline limestone, mudstone to grainstone, chert, and collapsed breccia. The Leached and Collapsed member is characterized by bioturbated iron-stained beds separated by massive limestone beds and stromatolitic limestone. The cavern development in the Leached and Collapsed is extensive lateral development and typically develops large rooms. The Leached and Collapsed member is the most porous and permeable member of the Person formation.

The Regional Dense member is approximately 20 to 24 feet thick. The lithology consists of dense, argillaceous mudstone. The Regional Dense member is most susceptible to erosion. The Regional Dense member is identified in the field by the wispy iron-oxide stains. The cavern development is typically vertical fracture enlargement. The Regional Dense member has low permeability and typically a vertical barrier.

The Grainstone member is approximately 50 to 60 feet thick. The lithology consists of Miliolid grainstone, mudstone to wackestone, and chert. The Grainstone member is identified in the field by white crossbedded grainstone. The cavern development within the Grainstone member is rare. The Grainstone member has low permeability.

No environmental concerns or geological sensitive features were observed during the site evaluation.

## **ENVIRONMENTAL CONCERNS**

The environmental concerns associated with this development being constructed on the Edwards Aquifer Recharge Zone are:

### **Site Specific Concerns**

1. The eastern boundary of the site lies in the 100-year floodplain, where recharge may occur.

### **General Concerns**

1. The improper use of pesticides, herbicides, or fertilizers needed for landscape maintenance that may be carried off in the first flush of stormwater run-off.
2. The build-up of hydrocarbons and other pollutants on streets, parking lots and other paved areas that are then carried off in the first flush of stormwater run-off.

## **ENVIRONMENTAL RECOMMENDATIONS**

The following recommendations address the environmental concerns raised by the construction of this development on the Edwards Aquifer Recharge Zone:

### **Site Specific Recommendations**

1. The impervious cover shall not exceed 60% on the 10.281-acre tract.
2. A floodplain buffer shall be provided along the eastern boundary of the site where the floodplain transects the property as required in Ordinance No. 81491, Section 34-913.

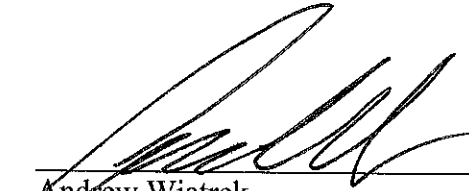
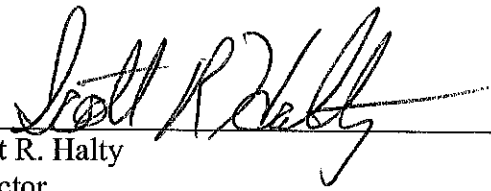
3. The land uses within the project site shall be in conformance with the table of permitted uses at the time the re-zoning is approved. Should a proposed use be listed as requiring City Council approval, the owner/operator shall apply for re-zoning for that particular use at the project site. If the land use is listed as special use, a special permit must be obtained for that use. If the land use is listed as not allowed, that land use will not be permitted on the project site.
4. The owner of all water pollution abatement structures shall ensure these structures are properly maintained and kept free of trash and debris. A signed water quality maintenance plan must be submitted to the Aquifer Protection & Evaluation Section of SAWS. If at any time the ownership of the property changes, the seller must disclose to the buyer all the requirements of the water quality maintenance plan. The new owner must submit a signed water quality maintenance plan to the Aquifer Protection & Evaluation Section of SAWS.
5. Landscaped areas shall be sensitive to minimizing water needs, i.e., use of native plants. Each purchaser of an individual lot or tenant within this development shall be informed by the seller or lessor in writing about Best Management Practices (BMP) for pesticide and fertilizer application. Preventing Groundwater Pollution, A Practical Guide to Pest Control, available from the Edwards Aquifer Authority (210) 222-2204, or equivalent information produced by the U.S. Natural Resource Conservation Service, Texas Department of Agriculture, U.S. Department of Agriculture, shall be used.
6. The applicant shall notify the Construction Monitoring of SAWS at (210) 233-3565 no later than 48 hours prior to the commencement of construction at the site. If any significant geologic features such as, but not limited to, solution openings, caves, sinkholes, or wells are found during the excavation, construction, or blasting, the developer shall notify the Texas Commission on Environmental Quality and the Aquifer Protection & Evaluation Section of SAWS at (210) 233-3522.

#### **General Recommendations**

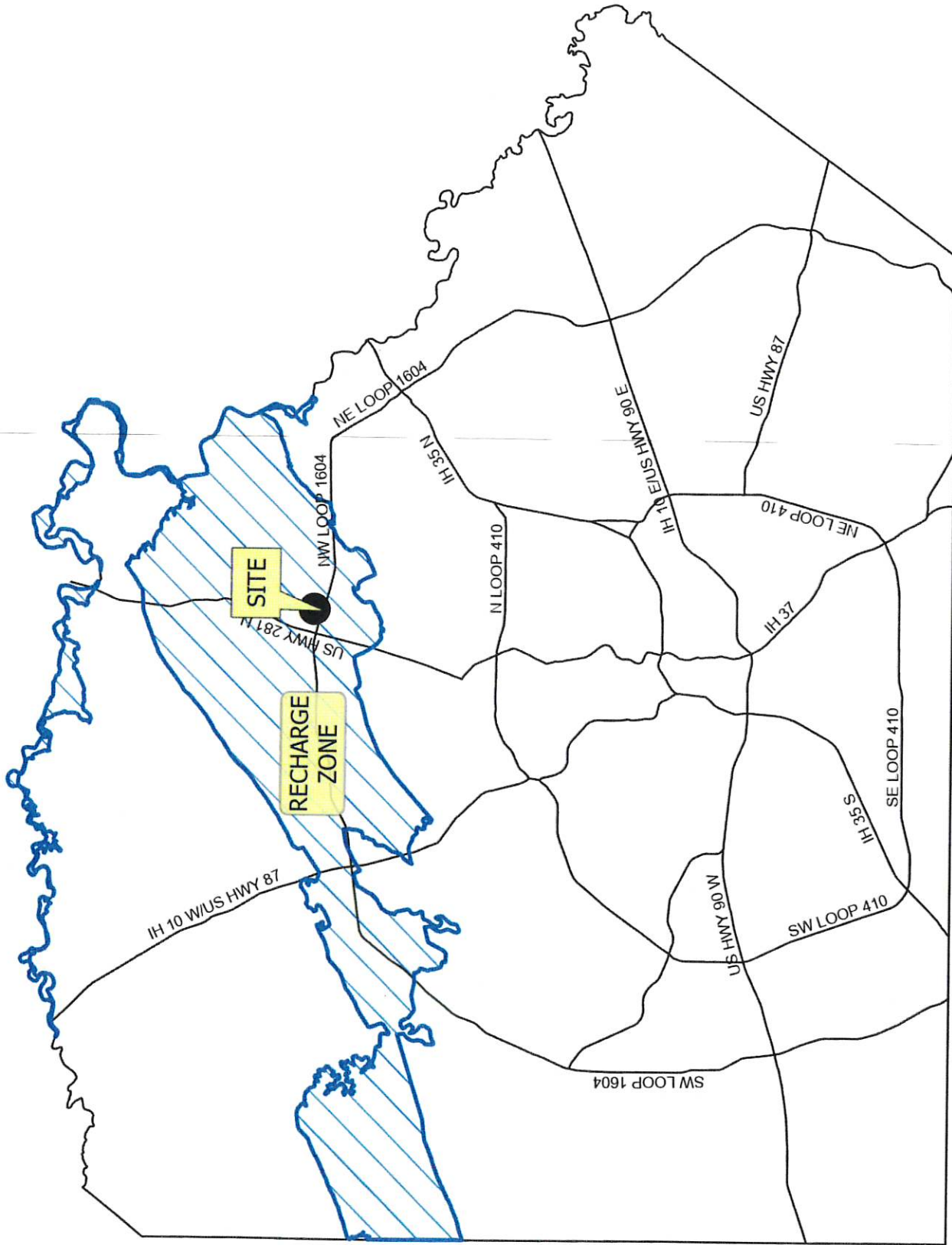
1. The City of San Antonio shall inspect all future construction of the sewage collection system to include service laterals and sewer mains for proper construction according to State and City Regulations and Code.
2. The Resource Protection & Compliance Division staff shall have the authority to inspect the site to ensure that the approved recommendations are being strictly adhered to during and after construction of the project.

Based on the site evaluation of the property, and the information submitted by the applicant, staff recommends **approval** of the proposed land use. Additionally, SAWS staff recommends that the applicant, or any future owner, comply with the above recommendations regarding the development of the subject property.

APPROVED:

  
\_\_\_\_\_  
Andrew Wiatrek  
Manager  
Edwards Aquifer and Watershed Protection Division  
\_\_\_\_\_  
Scott R. Halty  
Director  
Resource Protection & Compliance Department

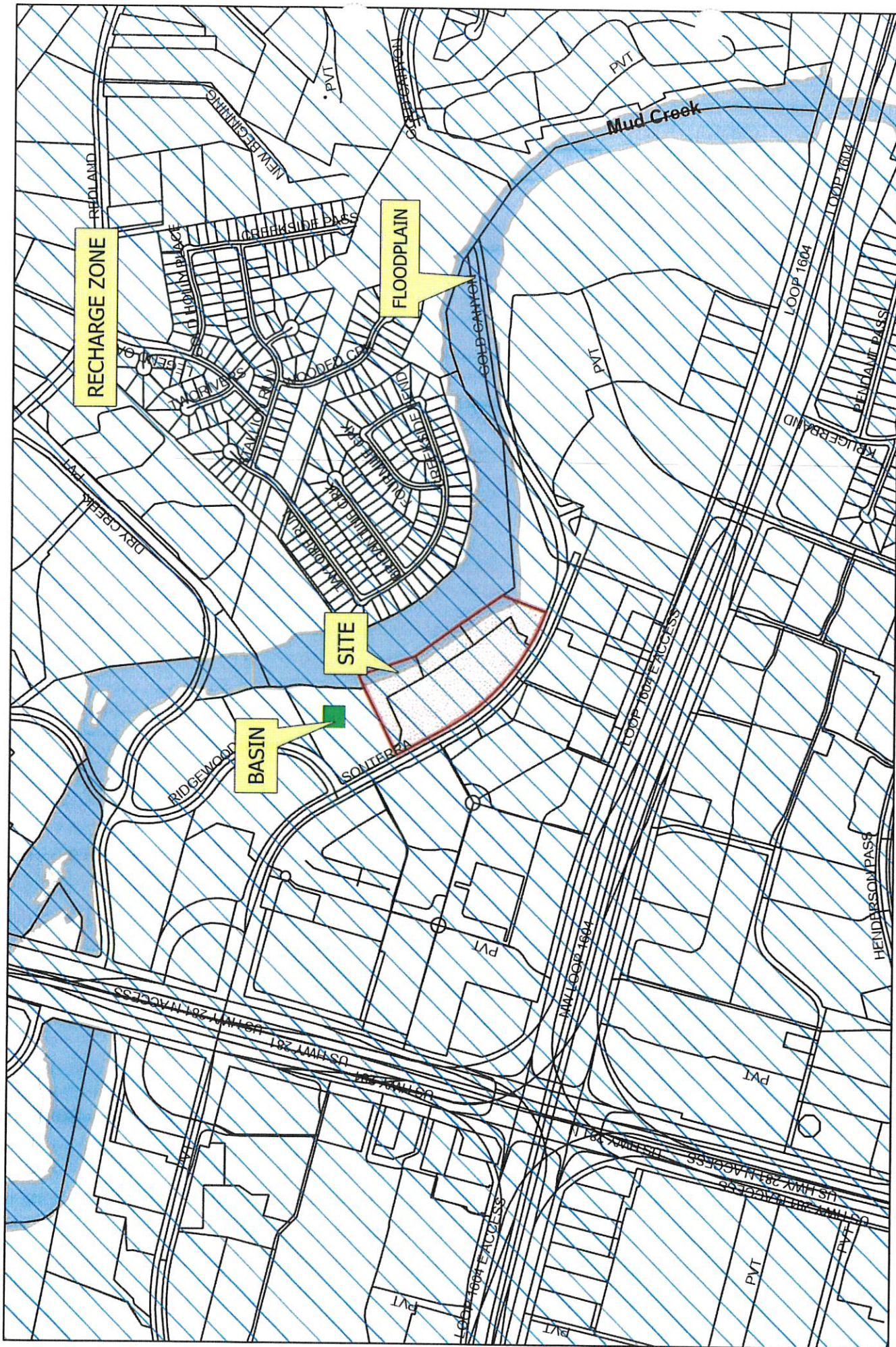
MJB:MAE



ZONING FILE: Z2024-10700181 (FIGURE 1)  
ZONING CASE: SANTILOS LEGACY MF-33

Map prepared by SAWS Resource Protection & Compliance Dept. MAE 7-6-2024





ZONING FILE: Z2024-10700181 (FIGURE 2)  
ZONING CASE: SANTIKOS LEGACY MF-33

1 inch equals 711 feet

