



March 3rd, 2025

Administrative Exception/Variance Request Review

City of San Antonio

Development Services Department

1901 S. Alamo

San Antonio, TX 78204

Re: Intertek Callaghan PV Project

Plat #11556

UDC Code Section: 35-523 (f) (2) **Table 523-1A** Mitigation Maximum

Dear Development Services,

This letter is to request consideration and variance pertaining to the removal of trees directly impeding the construction of the Intertek Callaghan PV Project located at 4950 Callaghan Road, San Antonio, TX 78228. We have enlisted expert consultation by a local arborist to survey and assist in crafting all impacts of the project area and have taken measures to fully assess environmental considerations of the renewable energy project. We request that a variance be granted to remove all trees directly impacting the project site to establish the solar project and provide a Fee-In-Lieu Payment to the Tree Mitigation Fund.

A plan amendment for this site **was approved** by the City Planning Commission on **January 22nd, 2025**. This approval was for the project only and did not include this variance letter or mitigation strategy for review.

The specific UDC Code section for the AEVR is: **35-523 (f) (2) Table 523-1A Mitigation Maximum**.

Tree Mitigation Strategy: Fee-In-Lieu Payment Tree Mitigation Fund

- a. Total ESA Significant Protected Inches: 153.5 INCHES
- b. Required ESA Significant Preservation (80%): 122.5 INCHES
- c. Provided ESA Significant Preservation (13.7%): 21 INCHES
- d. Required ESA Significant Mitigation: 101.5 INCHES
- e. Fee-In-Lieu Payment to tree mitigation fund @ \$200/inch: \$ 20,300.00 DOLLARS

Tree Fee-in-Lieu Calculations		
Total Fee-in-Lieu Payment:	\$20,300	Dollars

The rationale for this request is that the current tree coverage of the site will impede the successful implementation of long term and scalable renewable energy assets to be deployed on

site which will directly offset a large portion of the carbon footprint associated with standard operations. Specifically, a **1.138 MWdc** ground mounted solar array that will generate **1,866 MWh** of renewable energy in Year 1. The area behind the Intertek Automotive Research operations is an optimal south/south-east facing area for solar development, albeit with tree coverage that impedes the development area, and reduce any large shadows cast by adjacent trees in the project area which would interfere with production potential of the solar panels.

We have provided Development Services Department with all related engineered drawings for this project to include site, civil and electrical plans for consideration of this project. As mentioned above we have also developed a tree survey and exhibit for review to properly assess the impact of preservation and removal of trees onsite.

We have evaluated all aspects relating to tree preservation and mitigation on the project site. Firstly, we are preserving all trees that are not directly impacting the project feasibility. Secondly, we looked for opportunities to replant onsite. On this point we were unable to locate any reasonable areas to replant due to the constrained footprint of the project site and the underground utilities that are located throughout the location. Lastly, and the only viable mitigation strategy is to pay into the Mitigation Fund to offset the tree removals necessary to move forward with the project.

In response to our efforts to abide by the spirit and intent of the UDC and maintain priority around health and public welfare we have contacted all local neighborhood associations in order to provide visibility into the project and we are taking all necessary steps to reliably enhance the community with this green energy initiative. Initial contact was made to both the Ingram Hills Neighborhood Association and Thunderbird Neighborhood Association via email on November 1, 2024 and a follow up on February 28, 2025. We have provided access to any additional information to both neighborhood associations pertaining to the project. We have received no responses from Thunderbird Neighborhood Association but have received positive feedback and support for the project from Ingram Hills Neighborhood Association.

- The area is not currently able to be utilized for the renewable energy project due to the presence of trees in the available area.
- This hardship applies specifically to the land, not personal circumstances.
- This area is covered by a variety of trees that will cause impediment to the solar field and shading over the solar panels so as to dramatically impact renewable energy generation of the field.
- The hardship is not due to any action by way of the applicant.
- The granting of this variance will not be injurious to any other property or prevent orderly subdivision.

In Conclusion it is our professional opinion, the proposed variance remains in harmony with the spirit and intent of the UDC as it will not adversely affect the health, safety, or welfare of the public.



Sincerely,

 General Manager HOLT Renewables
Signature and Title Block of Applicant


Signature of Owner (if applicable)
Regional HSE Manager, Intertek

For Office Use Only:		AEVR #:	Date Received:
DSD – Director Official Action:			
<input type="checkbox"/> APPROVED	<input type="checkbox"/> APPROVED W/ COMMENTS	<input type="checkbox"/> DENIED	
Signature:		Date:	
Printed Name:		Title:	
Comments:			