

PETITION FOR THE CREATION OF
SAN PEDRO CREEK MANAGEMENT DISTRICT

THE STATE OF TEXAS §

COUNTY OF BEXAR §

TO THE HONORABLE TEXAS COMMISSION ON ENVIRONMENTAL QUALITY:

Camaron Development, Ltd, a Texas limited partnership, through its general partner, Weston Urban, LLC, a Texas limited liability company; **425 N. Flores, Ltd.**, a Texas limited partnership, through its general partner Weston Urban, LLC, a Texas limited liability company; **And I Cannot Lye, LP**, a Texas limited partnership, through its general partner, And I Cannot Lye GP, LLC, a Texas limited liability company; **Everybody Has a Plan, LP**, a Texas limited partnership, through its general partner, Everybody Has a Plan GP, LLC, a Texas limited liability company, and **CHSR Interests, LLC**, a Texas limited liability company (collectively, the “**Petitioner**”), and respectfully petitions the Commissioners of the Texas Commission on Environmental Quality (the “**Commission**”) for the creation of a municipal management district in Bexar County, Texas. Petitioner holds title to a majority (86%) of the assessed value of the real property described in Exhibit A, attached hereto and incorporated herein for all purposes, as indicated by the appraisal roles of Bexar County, Texas (the “**County**”). Petitioner, acting pursuant to the provisions of Chapter 375, Texas Local Government Code (“**Chapter 375**”), together with all amendments and additions hereto, would respectfully show the following:

I. District Name

The name of the proposed district shall be the “**SAN PEDRO CREEK MANAGEMENT DISTRICT**” (the “**District**”). There is no other municipal management district or conservation or reclamation district in the County with the same name.

II. General Powers

The District shall be created and organized and shall exist under the terms and provisions of Article XVI, Section 59, and Article III, Sections 52 and 52-a of the Texas Constitution and Chapter 375, together with all amendments and additions thereto.

III. Specific Powers

The District shall have all the rights, powers, privileges, authority, and functions conferred by and shall be subject to all duties imposed by the Texas Local Government Code and the general laws of the State of Texas relating to municipal management districts.

The District shall have the specific powers described in Section 375.092 of Chapter 375. The District shall have assessment powers pursuant to Subchapter F, Chapter 375.

IV. Boundaries

The area proposed to be within the District consists of approximately 41.32 acres as described by metes and bounds in Exhibit “A” (the “**Property**”). The Property is located wholly within the corporate limits of the City of San Antonio, Texas (the “**City**”) and the County. No portion of the Property is located within the corporate boundaries or extraterritorial jurisdiction of any other incorporated city, town or village. All of the territory proposed to be included in the District may properly be included in the District.

V. Property Owners

The undersigned constitute the majority value (86%) of the holders of title of the land within the proposed District, as indicated by the tax rolls of the central appraisal district of the County, and by conveyances of record since the date of preparation of said tax rolls.

There is a single lien holder on three tracts of property owned by And I Cannot Lye GP, LLC, to wit properties 552131, 522129, and 552125 in Exhibit A-1.

VI. Purpose

The general nature of the work proposed to be done by the District at the present time is to promote and benefit the commercial development of the northwest segment of the City’s downtown central business district, to be known as the San Pedro Creek Park District (the “**SPCPD**”). The SPCPD is less developed than the rest of the downtown area, consisting primarily of empty lots and aged buildings. The District is necessary to promote, development, encourage, and maintain employment, commerce, economic development, and the public welfare in the SPCPD, including activating the San Pedro Creek Cultural Park area by contributing to the construction and development of a multipurpose facility to be used as community center for conventions, meetings, professional and amateur sports, festivals, special events, etc., by providing funding for (i) landscaping, lighting, banners, and signs; (ii) sidewalks; (iii) pedestrian concourse; (iv) drainage improvements; (v) utilities, including electrical, gas, steam, and chilled water facilities; (vi) public green space, plaza, and scenic areas; (vii) public art; (viii) acquisition of property and demolition, and (ix) similar improvements.

VII. Need

There is, for the following reasons, a necessity for the above-described work, services, and improvements: The area proposed to be within the District is a blighted segment of the City’s central business district, comprised primarily of surface lots and aged buildings. The recent addition of the San Pedro Creek Cultural Park at the river level has renewed interest in this area. The river level is maintained by the San Antonio River Authority.

The street level is anticipated to experience increased commercial growth and investment, but drawing this investment requires significant public infrastructure and facilities to promote, develop

and encourage commerce, economic development, and employment in this downtown area. A public necessity therefore exists for the organization of the District to provide for the construction, repair, maintenance, development, and provision of a multipurpose facility and community center and related improvements, including sidewalks, landscaping, lighting, public space, pedestrian concourse, etc. to anchor the economic and commercial growth of the surrounding areas within the District. Comparable services are not available from other systems, including special districts, municipalities, and regional authorities.

VIII. Eligible Projects

The proposed improvements are feasible and practical. A preliminary investigation has been instituted to determine the cost of the eligible projects and it is estimated from the information available that the total cost of the projects from the District will be approximately \$62 million.

IX. Initial Board Members

The following named persons are each and all over eighteen (18) years of age, citizens of the State of Texas, owners of land subject to taxation within the District (or are agents, employees, or tenants of such owners), and are otherwise qualified to serve as directors of the District under Chapter 375 (the “**Initial Directors**”):

1. Randal Smith (four-year term)
2. Bruce Hill (four-year term)
3. Hope Andrade (four-year term)
4. David Robinson, Jr. (two-year term)
5. Reid Ryan (two-year term)

A description of each individual’s experience is attached hereto as Exhibit B. Pursuant to Section 375.062, Texas Local Government Code, this Petition requests that the Commission divide the Initial Directors into two groups, with two directors serving two-year terms and three directors serving four-year terms. Succeeding directors shall be appointed by the City pursuant to Section 375.064, Chapter 375.

Each Initial Director shall execute a \$10,000 bond payable to the District and conditioned on the faithful performance of the director’s duties. Initial Directors shall take the oath of office prescribed by the Texas Constitution for public offices. The Oath shall be filed with the District.

X. City Consent

The City has adopted a resolution consenting to the creation of the District over the Property. A copy of this Resolution is attached as Exhibit C.

WHEREFORE, the undersigned respectfully pray that this Petition be properly filed, as provided by law; that notice of the application be given as provided therein; that a hearing be held if necessary and that this Petition be in all things granted; that the proposed municipal management district be organized; that the five (5) persons named herein be appointed to serve as temporary Initial Directors until their successors are duly appointed by the City Council; and for such other orders, acts, procedures and relief as are proper, necessary and appropriate to the purpose of creating and organizing the District and to the execution of the purposes for which the District shall be organized, as you may deem proper and necessary.

[signature pages to follow]

RESPECTFULLY SUBMITTED, this ____ day of _____, 2025, and executed this ____ day of _____, 2025.

PETITIONER:

CAMARON DEVELOPMENT, LTD
a Texas limited partnership,
by its general partner,

Weston Urban, LLC,
a Texas limited liability company

By: Randal Smith, Manager

THE STATE OF TEXAS §

COUNTY OF BEXAR §

This instrument was acknowledged by me on this _____ day of _____, 2025,
by _____, _____ of Weston Urban, LLC, a Texas limited liability
company.

[notary seal]

Notary Public in and for the State of Texas

425 N. FLORES, LTD
a Texas limited partnership,
by its general partner,

Weston Urban LLC,
a Texas limited liability company

By: Randal Smith, Manager

THE STATE OF TEXAS §

COUNTY OF BEXAR §

This instrument was acknowledged by me on this _____ day of _____, 2025,
by _____, _____ of Weston Urban, LLC, a Texas limited liability
company.

[notary seal]

Notary Public in and for the State of Texas

AND I CANNOT LYE, LP
a Texas limited partnership
by its general partner,

And I Cannot Lye GP, LLC,
a Texas limited liability company

By: Randal C. Smith, Manager

THE STATE OF TEXAS §

COUNTY OF BEXAR §

This instrument was acknowledged by me on this _____ day of _____, 2025,
by _____, _____ of And I Cannot Lye GP, LLC, a Texas limited
liability company.

[notary seal]

Notary Public in and for the State of Texas

EVERYBODY HAS A PLAN, LP
a Texas limited partnership
by its general partner,

Everybody Has a Plan GP, LLC,
a Texas limited liability company

By: Randal C. Smith, Manager

THE STATE OF TEXAS §

COUNTY OF BEXAR §

This instrument was acknowledged by me on this _____ day of _____, 2025,
by _____, _____ of Everybody Has a Plan GP, LLC, a Texas
limited liability company.

[notary seal]

Notary Public in and for the State of Texas

CHSR Interest, LLC
a Texas limited liability company
by its manager,

By: Carl R. Oliver, Manager

THE STATE OF TEXAS §

COUNTY OF BEXAR §

This instrument was acknowledged by me on this _____ day of _____, 2025,
by _____, _____ of CHSR Interest, LLC, a Texas limited liability
company.

[notary seal]

Notary Public in and for the State of Texas

Exhibit A-1

Property Owners in District

Property ID Number	Owner	Taxable Value (2024)	Petitioner Taxable Value
1313559	San Antonio ISD	0	0
101502	Camaron Development LTD	\$696,730	\$696,730
101497	Camaron Development LTD	\$265,370	\$265,370
101492	Camaron Development LTD	\$234,680	\$234,680
101498	Camaron Development LTD	\$892,480	\$892,480
101501	Camaron Development LTD	\$1,900,000	\$1,900,000
101531	SAISD	0	0
101506	CHSR Interests LLC	\$4,994,660	\$4,994,660
1076727	ArtPace	0	0
101510	Toomey Family Ltd Ptshp	\$920,780	0
101511	Toomey Family Ltd Ptshp	\$599,540	0
101509	Toomey Family Ltd Ptshp	\$1,051,770	0
101514	Toomey Family Ltd Ptshp	\$4,187,000	0
101533	Toomey Family Ltd Ptshp	\$1,044,160	0
101516	425 N. Flores Ltd	\$636,160	\$636,160
101523	425 N. Flores Ltd	\$2,000,000	\$2,000,000
101532	425 N. Flores Ltd	\$1,650,000	\$1,650,000
101524	425 N. Flores Ltd	\$0	\$0
101521	425 N. Flores Ltd	\$4,015,000	\$4,015,000
1138111	217 W. Travis Ltd	\$4,318,660	\$4,318,660
101561	San Antonio River Authority	0	0
101560	San Antonio River Authority	0	0
552131	And I Cannot Lye LP	\$16,282,260	\$16,282,260
522129	And I Cannot Lye LP	\$3,707,870	\$3,707,870
552125	And I Cannot Lye LP	\$8,909,870	\$8,909,870
552130	Everybody has a Plan LP	\$639,500	\$639,500
		\$58,946,490.00	\$51,143,240.00
		100%	86%



Denotes government and nonprofit property



Denotes property owned by an affiliate of the undersigned

Exhibit B

INITIAL DIRECTORS – EXPERIENCE

Director 1

Name: Randal Smith

Experience: agent of property owner and CEO and Founder of Weston Urban; real estate developer since 2007

Director 2

Name: Bruce Hill

Experience: owner of property; real estate developer and investor since 1980

Director 3

Name: Hope Andrade

Experience: owner of property; entrepreneur

Director 4

Name: David Robinson, Jr.

Experience: agent of property owner and Development Manager at Weston Urban

Director 5

Name: Reid Ryan

Experience: owner of property; CEO Ryan Sanders Sports & Entertainment

Exhibit C

City of San Antonio Consent Resolution

SAMPLE RESOLUTION

WHEREAS, Camaron Development, Ltd, a Texas limited partnership, through its general partner, Weston Urban, LLC, a Texas limited liability company; 425 N. Flores, Ltd., a Texas limited partnership, through its general partner Weston Urban GP, LLC, a Texas limited liability company; And I Cannot Lye, LP, a Texas limited partnership, through its general partner, And I Cannot Lye GP, LLC, a Texas limited liability company; and Everybody Has a Plan, LP, a Texas limited partnership, through its general partner, Everybody Has a Plan GP, LLC, a Texas limited liability company (collectively, the “Petitioner”), wishes to create San Pedro Creek Management District (the “District”) to serve the approximately 41.32 acres of land, more or less, in Bexar County, Texas as described in Exhibit A attached hereto and incorporated herein for all intents and purposes (the “Property”); and

WHEREAS, all of the Property to be included within the District is located within the corporate boundaries of the City of San Antonio (the “City”); and

WHEREAS, the Petitioner has submitted to the Mayor and City Council a petition for Consent to Creation of the San Pedro Creek Management District; and

WHEREAS, the general nature of the work to be done in the District is the construction, repair, maintenance, development and provision of a multipurpose facility and community center for conventions, meetings, professional and amateur sports, festivals, special events, etc. and related improvements, including sidewalks, landscaping, lighting, public space, and a walking path, to anchor the economic and commercial growth of the surrounding areas within the District; and

WHEREAS, the City Council of the City desires to adopt a Resolution for the purpose of consenting to the creation of the District;

NOW, THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF SAN ANTONIO, TEXAS:

Section 1. The City Council hereby grants its consent to and the City Manager is instructed to execute such additional documents, if any, as required to evidence the City’s consent to the creation of a municipal management district, to be known as the “San Pedro Creek Management District” on the Property as described in Exhibit A which is located within the City’s corporate boundaries.

Section 2. The creation of the District will provide need funding to enhance the economic health and vitality of the San Pedro Creek Park District to create a community center activating the San Pedro Creek Cultural Park.

Section 3. The City finds that proposed projects are reasonable and feasible, would benefit the public, and there are no comparable services from other entities. The City further finds that all of the Property to be included in the boundaries of the District will be benefited by the works and projects that are to be accomplished and services to be provided under Chapter 375, Texas Local Government Code.

Section 4. The City will not be relieved from providing services to the Property included in the District and the City will not be released from its obligation to provide municipal services to the District.

Section 5. The City's consent to the creation of the District is conditional upon the City's right to appoint succeeding board members from recommendations made from the District's Board of Directors as initially appointed by the Texas Commission for Environmental Quality.
