



• **Engineers**  
• **Surveyors**  
• **Planners**

**Moy Tarin Ramirez Engineers, LLC**

December 18, 2024

Tree Variance Request Review  
City of San Antonio  
Development Services Department  
1901 S. Alamo  
San Antonio, TX 78204

Re: CPS Energy – Scenic Loop Transmission Line – Tree Preservation Plan  
TRE-APP-APP24-38802693  
Environmentally Sensitive and Regulatory Floodplain Canopy Preservation, Floodplain Heritage  
Tree Preservation  
SAUDC 35-523(h)

- ☐ Administrative Exception
- ☒ Environmental Variance
- ☐ Subdivision Platting Variance – Time Extension

To Whom It May Concern,

The CPS Energy – Scenic Loop Transmission Line project is located along Toutant Beauregard Road and extends west through the Pecan Creek floodplain to Crow Ranch Road. The Scenic Loop Transmission Line project will extend roughly  $\pm 4.38$  miles of overhead transmission line from the future CPS Substation on Toutant Beauregard Road. The project will be within recorded CPS Energy Easements with a total area of 56.428 AC, of which 19.517 AC will be disturbed during construction. The summary of tree canopy/heritage trees removed, preserved, and mitigation required can be found below:

Canopy Preservation

1. Upland Canopy
  - a. Total Area – 778,998 SF
  - b. Preserved Canopy – 429,571 SF
  - c. Removed Canopy – 349,427 SF
  - d. Percentage Preserved – 55.14%
  - e. Percentage Required – 25.00%
  - f. Required Mitigation – 0 inches – \$0.00
2. Environmentally Sensitive Area Canopy
  - a. Total Area – 285,605 SF
  - b. Preserved Canopy – 203,532 SF
  - c. Removed Canopy – 82,073 SF
  - d. Percentage Preserved – 71.26%
  - e. Percentage Required – 80.00%
  - f. Required Mitigation ~476 inches - \$95,245.02
3. Floodplain Canopy
  - a. Total Area – 327,569 SF
  - b. Preserved Canopy – 223,246 SF
  - c. Removed Canopy – 104,323 SF
  - d. Percentage Preserved – 68.15%

- e. Percentage Required – 80.00%
- f. Required Mitigation ~741 inches - \$148,140.12

#### Heritage Tree Preservation Requirements

1. Upland Heritage Trees
  - a. Total Inches – 798 inches
  - b. Preserved Canopy – 625 inches
  - c. Removed Canopy – 173 inches
  - d. Percentage Preserved – 78.32%
  - e. Percentage Required – 100.00%
  - f. Required Mitigation – 0 inches - \$0.00 (Canopy Preservation Surplus)
2. Environmentally Sensitive Area Heritage Trees
  - a. Total Inches – 443 inches
  - b. Preserved Canopy – 443 inches
  - c. Removed Canopy – 0 inches
  - d. Percentage Preserved – 100.00%
  - e. Percentage Required – 100.00%
  - f. Required Mitigation – 0 inches - \$0.00
3. Floodplain Heritage Trees
  - a. Total Inches – 1,742 inches
  - b. Preserved Canopy – 1,454 inches
  - c. Removed Canopy – 288 inches
  - d. Percentage Preserved – 83.46%
  - e. Percentage Required – 100.00%
  - f. Required Mitigation ~864 inches – \$172,800.00

Mitigation of the tree canopy and heritage trees was minimized by limiting construction access paths to 10' wide between overhead structures, preserving trees too short to interfere with the proposed overhead lines, and preserving heritage trees within proposed monopole structure clearing areas where possible. Contractor shall drill seed all areas disturbed by construction activities or tree removal. If drill seeding is not possible, contractor shall provide hydromulch. All seeding shall contain an approved native seed mix. Contractor shall ensure 85% establishment of vegetation in disturbed areas.

This Tree Variance is being submitted as a variance to the final tree canopy preservation requirement for areas identified within environmentally sensitive areas (ESA), the regulatory floodplain, and the final preservation requirement for heritage trees within the regulatory floodplain, as defined in section 35-523(h) of the City of San Antonio Unified Development Code (CoSA UDC). The applicant is requesting that the minimum canopy preservation requirement of 80% for trees within the environmentally sensitive areas, minimum canopy preservation requirement of 80% for trees within the regulatory floodplain, and the minimum heritage preservation of 100% for heritage trees located within the regulatory floodplain be waived for this project. The reasons for the request as it relates to the health, safety and welfare of the public are as follows:

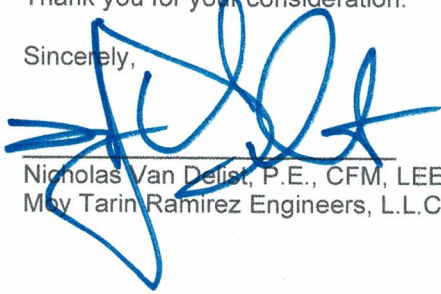
- The purpose of this CPS Energy project is the extension of a high voltage electrical overhead transmission line from the future Scenic Loop Substation. This project supports customer load growth and future development by extending additional electrical service into the region and helping to ensure service reliability to the public.
- It is in CPS Energy's best interest to locate the most efficient and non-invasive pathways for their overhead electrical lines as to not adversely impact the public. The overhead transmission lines proposed with this project went through extensive routing and siting to determine the best alignment in order to meet the Electric Reliability Council of Texas (ERCOT) requirements. The proposed alignment chosen was deemed the best option to meet both ERCOT and public wellbeing with minimal impact to adjacent properties. Generally, the proposed easements are located along the existing property boundaries and within areas deemed to minimally impact the public.

The applicant makes the assertion that all practicable measures to minimize any adverse impacts on the health, safety and public welfare have been taken with respect to the proposed improvements associated with the Scenic Loop Transmission Line project. Under the circumstances, the public interest underlying the proposed exception outweighs the public interest underlying the restriction against the need to meet the minimum preservation requirement for environmentally sensitive and regulatory floodplain areas for which this tree variance is being requested.

It is the applicant's opinion that the proposed tree / variances remain in harmony with the spirit and intent of the UDC as they will not adversely affect the health, safety, or welfare of the public.

Thank you for your consideration.

Sincerely,



Nicholas Van Derist, P.E., CFM, LEED AP  
May Tarin Ramirez Engineers, L.L.C.

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