



## PUBLIC WORKS

August 20, 2024

Jacob Villarreal  
5900 Evers Road  
San Antonio, Tx 78238

**Re: Floodplain Variance-REQ-AEVR-23-44400403  
FPDP #2024420  
3630 Callaghan Road-Sul Ross Middle School**

Dear Mr. Jacob Villarreal;

The Public Works Department Storm Water Division has been in review of Floodplain Development Permit (FPDP) #2024420 associated with the proposed improvements to Sul Ross Middle School property to include an overflow parking lot and driveway for athletic events. The proposed development is not in compliance with the current City of San Antonio Unified Development Code (UDC) Appendix F – Floodplains.

1. The proposed development does not meet the following UDC requirements:
  - Appendix F, Section 35-F124(f)(18), which indicates that “Parking Lot construction is allowed where water depths do not exceed six (6) inches within parking stalls during the regulatory % annual chance storm event. Water depths within drive lanes may exceed six (6) inches if depth and velocities are within the “Proceed with Caution” zone shown in Chapter 35, Appendix H, Figure 4.3.1C during regulatory 1% annual chance storm event, or if the flooded drive lane does not prevent ingress/egress from the site (reference Appendix H, Chapter 6).”
2. A variance to the above UDC requirements will be required by Public Works Storm Water Division prior to approval of any building permit and issuance of the Floodplain Development Permit (FPDP).
3. The applicant has provided the following information to assist with the review of the variance to the above UDC requirements:
  - The applicant’s engineer has provided a flood study demonstrating that the proposed improvements will not create an adverse impact. Additionally, there will not be proposed fill for the proposed overflow parking lot and drive lanes.
  - The applicant’s engineer has demonstrated that with the additional 38,503 square feet of impervious cover for the school site that there will not be rises in water surface elevations or velocities in Zarzamora Creek.

- Although, the proposed parking lot and drive lane is entirely in the effective 1% annual chance and regulatory floodplain the engineer has demonstrated that secondary unflooded access is provided through Callaghan Road. Furthermore, this parking lot will only be used during athletic or special events as overflow parking where flood warning signage will be placed throughout the parking lot.
4. Public Works will support a variance to the above UDC requirements with the following conditions:
- Construction activities associated with the project within the FEMA designated floodplain shall not commence prior to approval of a building permit/site work permit and FPDP submitted to and approved by the Public Works Storm Water.
  - No fill will be allowed in the effective floodplain.
  - Flood signage in the parking lot and drive isle will be required and should be provided in the construction documents at the site work permit.

If the Variance is approved by the Planning Commission, Public Works Storm Water Division will issue a floodplain development permit once the above conditions are met. If you have further questions or require any further assistance and/or information, please contact Sabrina Santiago at (210) 207-0182 or [sabrina.santiago@sanantonio.gov](mailto:sabrina.santiago@sanantonio.gov).

Sincerely,

*Sabrina Santiago*

Sabrina Santiago, CFM  
Storm Water Engineering Manager/Floodplain Administrator

Attachments: AEVR #23-44400403  
Variance Request Hardship Letter  
Topographic Workmap/flood depth exhibit  
Denied FPDP #2024420

cc: Jessica Shirley-Saenz, Interim Assistant Director, Public Works Storm Water Division  
City of San Antonio, Planning Commission