

**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 Z2024-10700217 (W Loop 1604 MF-33)

**Date:** October 29, 2024

**SUMMARY**

A request for a change in zoning has been made for a 1.99-acre lot located on the city's north side. A change in zoning from “**C-2 NA AHOD MLOD-1 ERZD**” to “**MF-33 AHOD MLOD-1 ERZD**” is being requested by the applicant Koontz Properties, LLC, and represented by Patrick W. Christensen, Attorney at Law. The change in zoning has been requested to allow for a multi-family 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 0.50-mile west of Huebner Rd. and Loop 1604 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-2 NA AHOD MLOD-1 ERZD**” to “**MF-33 AHOD MLOD-1 ERZD**” will allow for a multi-family development on 1.99-acre lot. Currently, the lot is undeveloped with native trees and understory throughout the site. The project will consist of an apartment building with associated parking areas.

2. Surrounding Land Uses:

The Vineyard Springs Apartments is located north of the site. The Montessori School of San Antonio lies to the west. Blanco Springs Rd. borders to the east with Bigz Burger Joint located beyond. Undeveloped commercial property and Loop 1604 bounds south of the property.

3. Water Pollution Abatement Plan:

As of the date of this report, a WPAP has not been submitted to the Texas Commission on Environmental Quality (TCEQ). A WPAP will be required to be submitted to and approved by the TCEQ prior to commencement of construction.

4. Geologic Conditions:

The Aquifer Protection and Evaluation Section of the San Antonio Water System conducted a site evaluation on September 6, 2024, of the referenced property to assess the geologic conditions and evaluate any environmental concerns present at the site. SAWS Environmental Geologist, Mr. Bruce Keels, P.G., was present during the site evaluation.

The subject site was observed to be one lot currently vacant and undeveloped, approximately 1.99 acres in area. The site was observed to be bounded on the north by a CPS powerline easement with multi-family residential property beyond, on the east by Blanco Springs Drive, on the south and west by vacant and undeveloped property. The subject site was observed to be moderately vegetated with native ground level vegetation and trees. A few piles of rock and construction debris were observed, primarily along the western side of the subject site. A number of apparent geotechnical borings were observed throughout the site. Little to moderate bedrock exposure was observed throughout the subject site due to thick soil cover and vegetation.

The site appears to slope to the east. Stormwater occurring on the subject site would discharge to the east toward an unnamed tributary to Panther Springs Creek.

A geologic assessment dated 2001 was reviewed as part of this report. No sensitive geologic features were identified in this assessment, however an inferred fault along the southeastern edge of the property was identified. Due to thick soil cover and vegetation, no visual expression of this fault was observed on the subject site.

Using U.S. Geological Survey Water-Resources Investigations Report 95-4030 it was determined that the subject site is underlain by the Cyclic and Marine Member of the Person Formation.

The Cyclic and Marine Member of the Person Formation is characterized by the presence of thinly bedded mudstone, packstone and grainstone with structurally based porosity. The full section thickness of this member is approximately 80 to 90 feet thick. This member produces water and is considered a relatively permeable and environmentally sensitive section of the Edwards Aquifer.

Visual characteristics of bedrock exposure on the subject site confirms expression of the Cyclic and Marine Member.

The subject site was observed to be an undeveloped lot. No sensitive geologic features were observed.

## **ENVIRONMENTAL CONCERNS**

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

### **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 50% on the 1.99-acre lot.
2. 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.

3. 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.
4. 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.
5. 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. Prior to the release of any building permits, the following shall be submitted to the SAWS Aquifer Protection & Evaluation Section of the Resource Protection Division:
  - A. A copy of a Water Pollution Abatement Plan shall be submitted for the development within the area being considered for re-zoning,
  - B. A set of site-specific plans which must have a signed Engineers Seal from the State of Texas,
  - C. A WPAP approval letter from the Texas Commission on Environmental Quality,
  - D. A copy of the approved Water Pollution Abatement Plan.

3. 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:

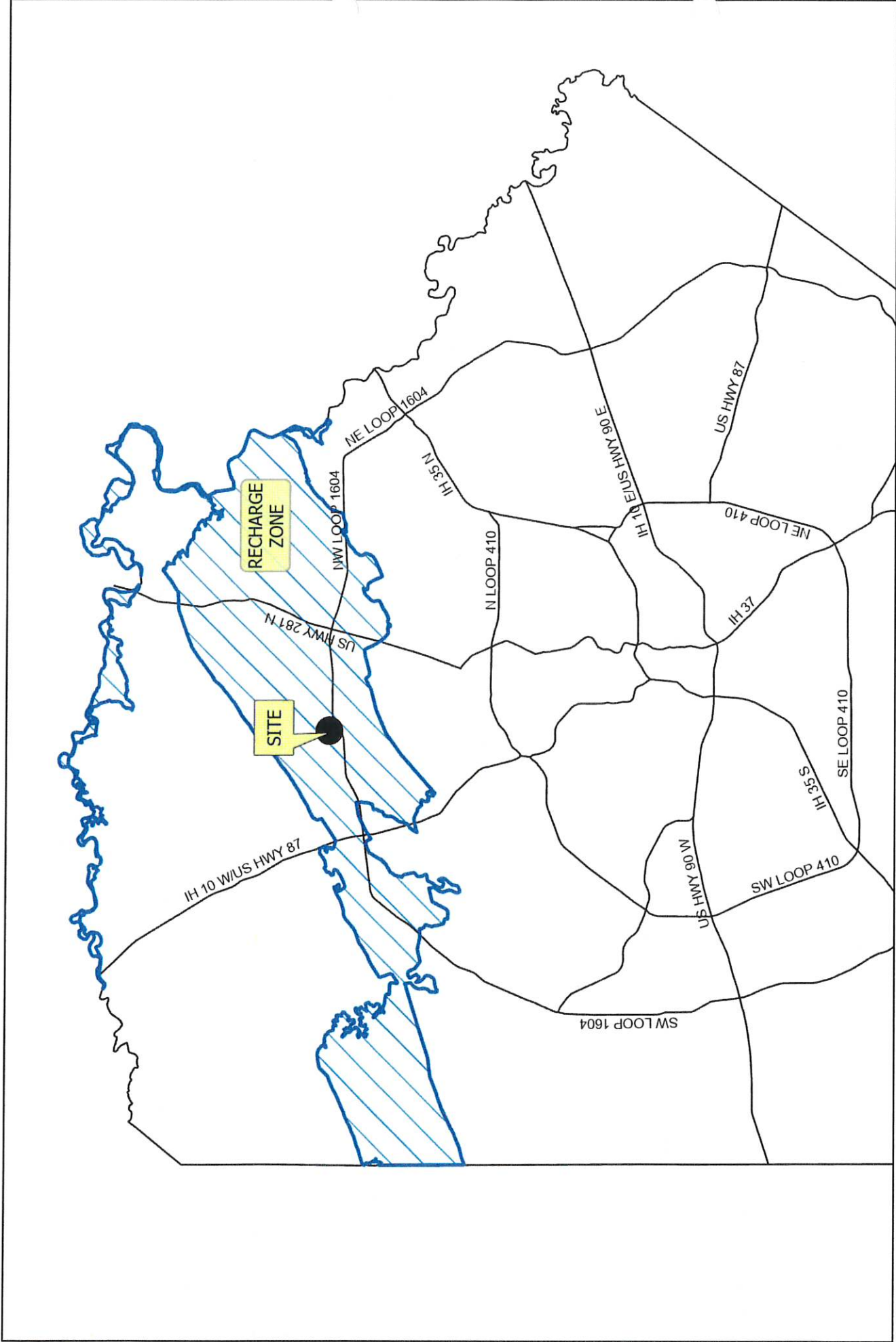


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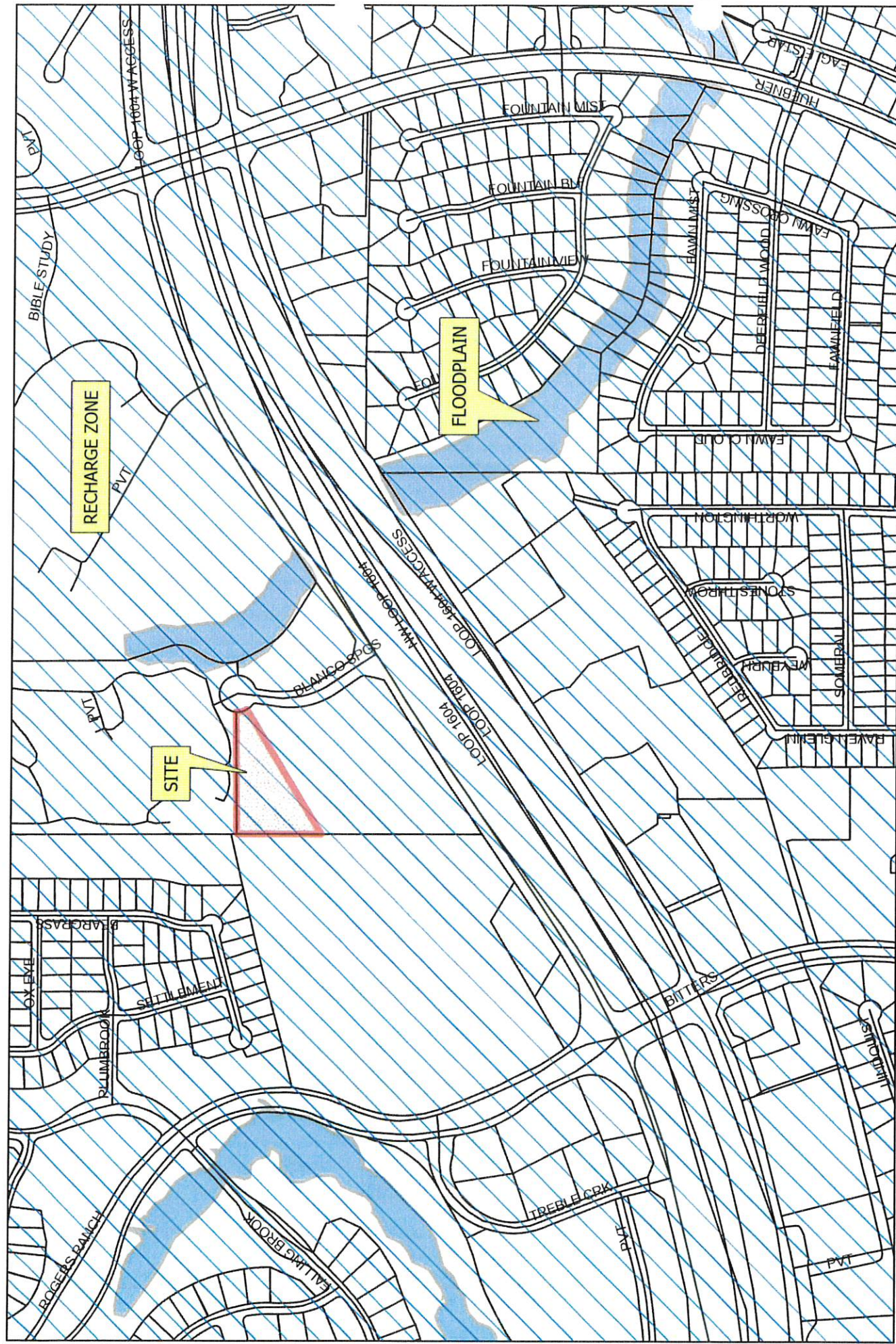
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ZONING FILE: Z2024-10700217 (FIGURE 1)  
ZONING CASE: W LOOP 1604 MF-33







**ZONING FILE: Z2024-10700217 (FIGURE 2)**

ZONING CASE: W LOOP 1604 MF-33

1 inch equals 490 feet



Map prepared by SAWS Resource Protection & Compliance Dept. MAE 9-6-2024