



CITY OF SAN ANTONIO
DEVELOPMENT SERVICES DEPARTMENT
P.O. BOX 839966 | SAN ANTONIO TEXAS 78283-3966



CERTIFICATE OF IMMINENT PERIL

October 6, 2022

RE: Case Number BOA-22-10300207
United Site Services, Inc.
3442 Belgium Ln - *NCB 10576 BLK 1 Lot 1 (Transport Intrntl Pool) (real)/ United Site Services Inc 3442 Belgium Ln Furn Fixt Mach Eqpt Veh Su Ot (personal)*

Chair of Board of Adjustment:

As Director of Development Services for the City of San Antonio, I hereby certify that in my opinion, implementation of the automatic stay provision of Section 35-481(a)(2) in the above-referenced appeal, allowing for continued operations pending a hearing, would cause **imminent peril to life or property** based on the facts set forth below.

On September 23, 2022, the City issued a *Notice of Intent to Revoke Certificate of Occupancy* to United Site Services of Texas operating at 3442 Belgium Ln due to its failure to cure significant health and safety violations described below.

On March 3, 2022, the City issued several Notices of Violation to United Site Services of Texas ("USS/T") for operating a business providing portable restrooms, showers, & restroom trailers and the onsite removal of human waste, which was detrimentally affecting nearby residents and neighborhood. Notices of violation included operating beyond the scope of the duly issued Certificate of Occupancy ("Construction Facility & Truck Repair") and for use prohibited within the property's "I-2" zoning (*See* UDC §35-311 - Use Regulations). Specifically, the use of property for purposes of a sanitary landfill or solid waste facility is not permitted (*See* §35-311-2 "Nonresidential Use Matrix"). Subsequent inspections in March, April, and May 2022 confirmed the continued existence of these violations resulting in the issuance of citations for Unpermitted Use, Operating outside the scope of its Certificate of Occupancy (COO)/Operating without a valid COO, and Failure to Comply with Off-Street Parking regulations. These health and safety violations have yet to be cured as of date.

Per City Code §10-12(a), no building or structure shall be used or occupied without a valid COO. Furthermore, per City Code §35-311-2, an "I-2" zoned property is not permitted to be used for sanitary landfill or solid waste facility. These operations are distinct violations of our City codes that are intended to protect the health, safety, and welfare of our citizens as well as the subject and surrounding properties.

As the facts show, allowing the stay and therefore continued unauthorized and unpermitted operations and occupancy until a hearing is held would cause imminent peril to life and property of residents and the neighborhood as well as Appellant.

Michael Shannon, PE, CBO
Director - Development Services Department
City of San Antonio

received via email 10/11/22