

**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 Z2022-10700273 (Indian Woods Self-Storage)

**Date:** October 28, 2022

**SUMMARY**

A request for a change in zoning has been made for an approximate 0.87-acre tract located on the city's northwest side. A change in zoning from “**O-2 ERZD AHOD MLOD-1 MNA**” to “**C-2 ERZD AHOD MLOD-1 MNA**” is being requested by the applicant, Shavano/LDR No. 4 Commercial Partnership, Ltd and represented by Caroline McDonald of Brown & Ortiz, PC. The change in zoning has been requested to allow for a self-storage facility. 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 in City Council District 8, approximately 875 feet south of DeZavala Rd and Indian Woods intersection. The property lies within the Edwards Aquifer Recharge Zone (Figures 1 and 2).

**SITE EVALUATION**

1. Development Description:

The proposed change is from “**O-2 ERZD AHOD MLOD-1 MNA**” to “**C-2 ERZD AHOD MLOD-1 MNA**” and will allow for a self-storage facility on a 0.87-acre lot. Currently, the site is undeveloped and vegetated with native trees and understory. The proposed project will consist of an indoor air-conditioned storage facility for luxury vehicles.

2. Surrounding Land Uses:

North of the subject property bounds Indian Woods Rd. and a Wal-Mart Neighborhood Market. To the east borders BASIS Charter School and to the south lies a CPS electric tower easement. A SAWS water tower easement under construction lies to the west of the site.

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 26, 2022, 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 a single lot, currently undeveloped and vacant, approximately 0.87 acres in area. The site is bounded on the north with Indian Woods with a retail facility beyond, on the west by a dirt road with a SAWS facility currently under construction beyond, on the south by vacant property with a CPS property beyond, and on the east by a school. The property was observed to be moderately to heavily vegetated with trees and ground level vegetation.

Little to no bedrock exposure was observed throughout the subject site, due to extensive soil cover. One small non-karst closed depression was observed within the site and was not considered to be geologically sensitive.

The topography of the property was observed to slope to the east. Stormwater occurring on the subject site would discharge to the east toward an unnamed tributary to Olmos Creek.

Using U.S. Geological Survey Water-Resources Investigations Report 95-4030 it was determined that the majority of the subject site is underlain by the Cyclic and Marine Member of the Person Formation of the Edwards Aquifer, while the southern tip of the subject site was determined to be underlain by the Upper Confining Unit Undivided of the Edwards Aquifer.

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. No visible characteristics of this member was observed due to the extensive soil profile.

The Undivided Upper Confining Unit is characterized by the presence of massive limestone with very low porosity and permeability throughout the formation. The full section thickness of this member is approximately 30 feet thick. This unit includes the Del Rio Clay, Buda Limestone, and Eagle Ford Group, and is considered the upper margins of the Edwards Aquifer. No visible characteristics of this member was observed due to the extensive soil profile.

Using the Soil Survey of Bexar County, compiled by the United States Department of Agriculture, it was determined that the soil profile of the subject site included the Tarrant Association soils (TaB), and Crawford Series soils (Ca).

The Tarrant Association soils are stony soils, very shallow dark colored and undulating. The surface layer is dark grayish brown calcareous clay loam approximately 10 inches thick, with limestone fragments from ¼ inch to 24 inches in diameter. The subsurface layer is generally hard fractured limestone to a depth of approximately 8 inches. The soil profile observed on the subject site was noted to be many inches deep.

The Crawford Series soils are dark grayish brown to reddish brown non calcareous clay approximately 8 inches in depth. It has a fine, subangular, blocky and granular structure, with few to many fragments of chert and limestone. The soil profile observed on the subject site was noted to be only several inches deep.

No sensitive geologic features were observed within the subject site.

## **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

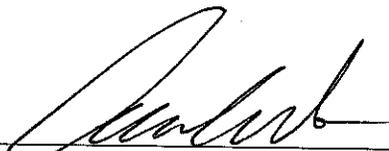
1. The impervious cover shall not exceed 65% on the 0.87-acre site.
2. No automotive maintenance shall be allowed on site including but not limited to engine repair, body work, oil changes, tire repairs, or battery replacements.
3. No additional storage of automotive fluids, nor vehicle batteries shall be allowed on site, other than the fluids contained within vehicles on site.
4. No car washing of vehicles shall be allowed on site.
5. 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.
6. 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.
7. 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.

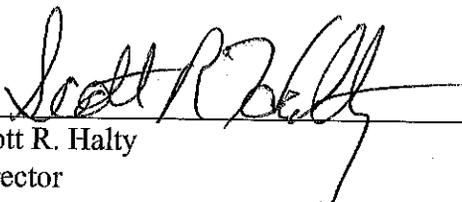
**General Recommendations**

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 the 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.

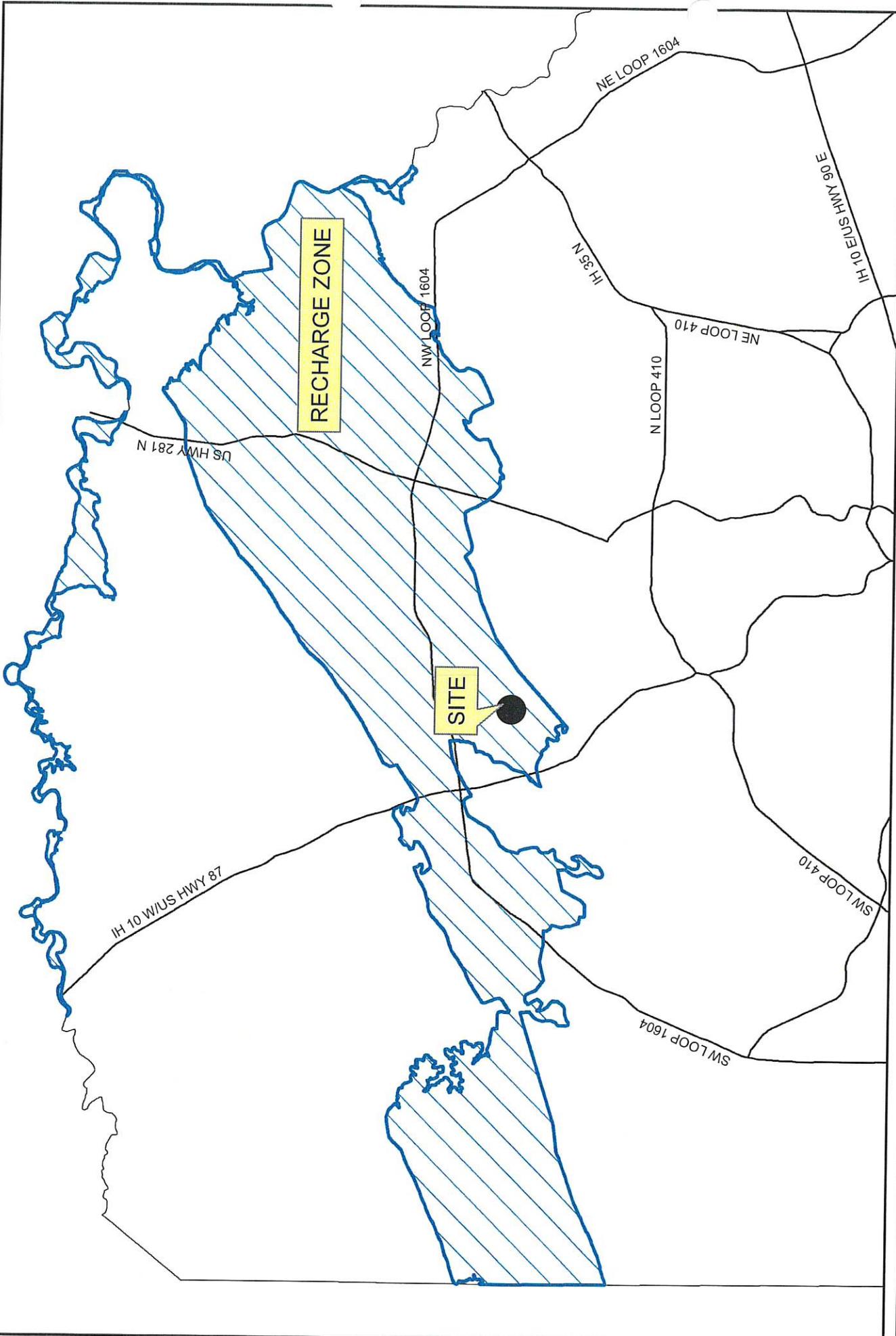
Based on the site evaluation of the property, and the information submitted by the applicant, staff recommends **approval** of the proposed land use. Additionally, SAWS staff recommends that the applicant, or any future owner, comply with the above recommendations in regards to the development of the subject property.

APPROVED:

  
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Andrew Wiatrek  
Manager  
Edwards Aquifer and Watershed Protection Division

  
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Scott R. Halty  
Director  
Resource Protection & Compliance Department

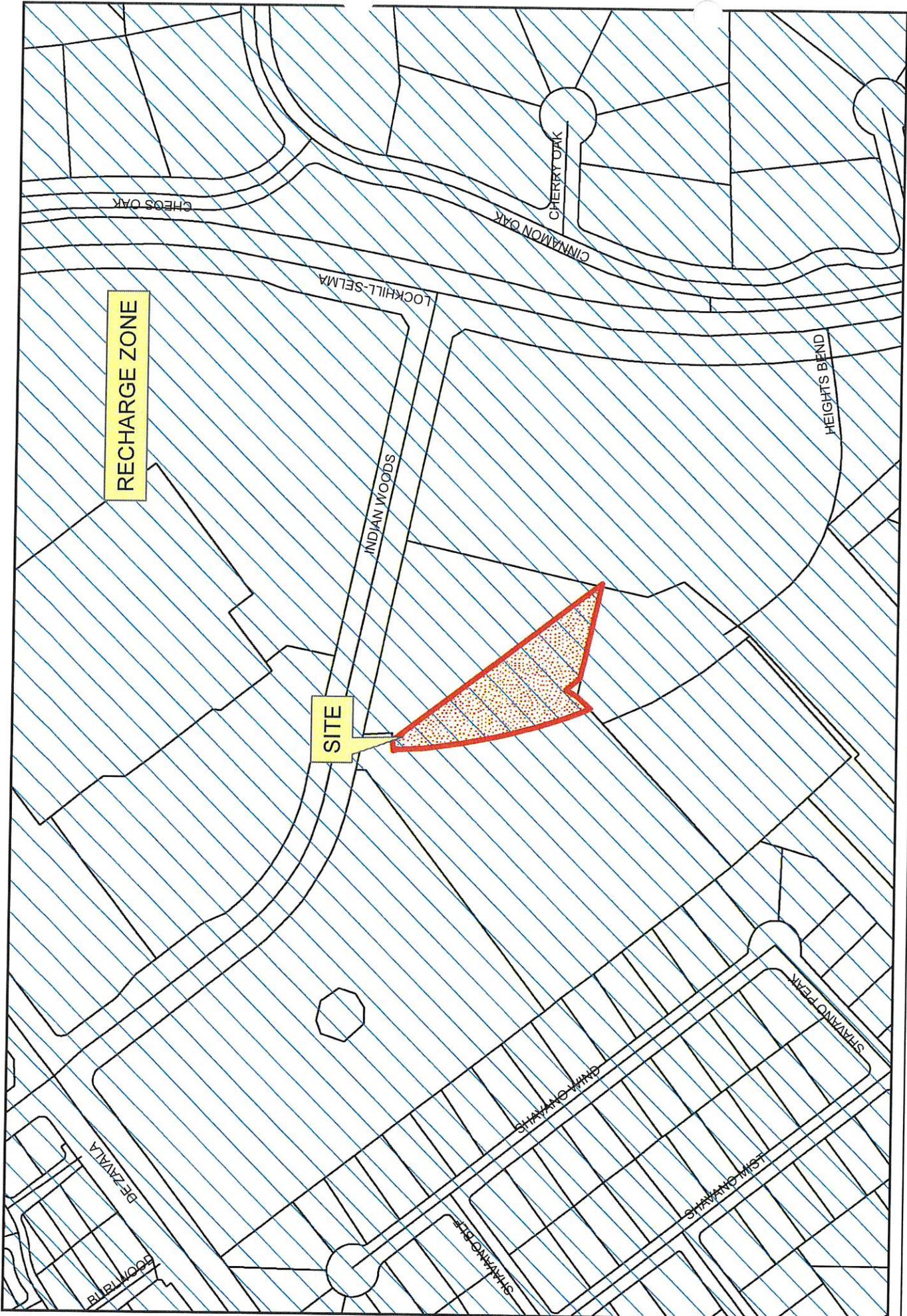
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ZONING CASE: INDIAN WOODS STORAGE (FIGURE 1)  
 ZONING FILE: Z2022-10700273

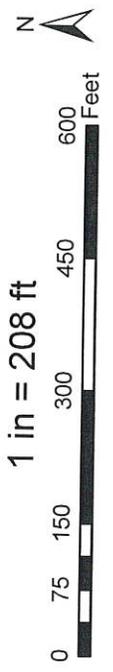
Map Prepared by SAWS, Resource Protection & Compliance Dept. MAE 9/21/2022





ZONING CASE: INDIAN WOODS STORAGE (FIGURE 2)  
 ZONING FILE: Z2022-10700273

Map Prepared by SAWS, Resource Protection & Compliance Dept. MAE 9/21/2022



1 in = 208 ft