

**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 Z2022-10700272 (I-10 Cantera Rim MXD)

**Date:** December 12, 2022

**SUMMARY**

A request for a change in zoning has been made for an approximate 26.56-acre tract located on the city's northwest side. As further described below, the tract includes property both within the Edwards Aquifer Recharge Zone and the Contributing Zone. A change in zoning from "**O-2 MLOD-1 MLR-1 MSAO-1 AHOD ERZD**" to "**MXD MLOD-1 MLR-1 MSAO-1 AHOD ERZD**" is being requested by the applicant IH-10 Cantera-Rim, Ltd., and represented by Ashley Farrimond of Killen, Griffin, & Farrimond, PLLC. The change in zoning has been requested to allow for a mixed-use development. The property is currently designated 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 8, approximately 0.70-miles north of La Cantera Parkway and IH-10 West intersection. A portion of the property, 16.48-acres lies within the Edwards Aquifer Recharge Zone and the remaining 10.08-acres lies in the Contributing Zone (Figures 1 and 2).

**SITE EVALUATION**

**1. Development Description:**

The proposed change is from "**O-2 MLOD-1 MLR-1 MSAO-1 AHOD ERZD**" to "**MXD MLOD-1 MLR-1 MSAO-1 AHOD ERZD**" and will allow for a mixed-use development on approximately 26.56-acres. The property is currently undeveloped and vegetated with native trees and understory. The proposed project will consist of an assisted living facility, nursing home, single & multi-family units with associated parking areas.

2. Surrounding Land Uses:

A CPS electric transmission easement and a CPS electric substation lies north of the property. Undeveloped property and Legend Hollow neighborhood bounds west of the site. IH-10 West and The Rim retail center lies east of the site. Undeveloped property and Eilan development borders to the south.

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 30 and October 3, 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 one lot, currently undeveloped and moderately to heavily vegetated with trees and ground level vegetation, approximately 26.56 acres in total, including 10.08 acres within the contributing zone, and 16.48 within the Edwards Recharge Zone. The site is bounded on the north by a high-tension power line easement with an electrical substation beyond, on the west by undeveloped property with single family residential property beyond, on the south by undeveloped property with a mixed-use development beyond, and on the east by IH-10 with commercial property beyond. The site was observed to have two high points in the southern portion, both within the Recharge Zone. A series of excavation cuts in the southwestern quadrant of the site were identified through historical aerial photographs to have been used as apparent exploratory excavations in the 1960s. Excavation debris and tailings were observed throughout much of the northern portion of the subject site, forming ramps on the northern down sloped areas in the contributing zone. Some indications were also apparent that fill materials, possibly debris from adjacent construction activity, was placed in similar nature along the northern down sloped portions of the site. Evidence of several geotechnical borings were observed throughout the property. A number of non-karst closed depressions were observed throughout the property and were not considered to be geologically sensitive.

Indications of multiple geotechnical boreholes and at least one apparent test trench were observed throughout the subject site. An apparent solution cavity was observed within the western portion of the site. This feature is not considered to be geologically sensitive.

Moderate to good bedrock exposure was observed throughout the site, primarily within the southern portion of the property within the Edwards Recharge Zone. Portions of the northern half of the subject site, located primarily within the Edwards Contributing Zone, was observed to have large quantities of fill material placed throughout. This fill material appears to be composed of soil and fractured rock, with smaller quantities of apparent construction debris.

The topography of the northern portion of the property was observed to slope to the north and east, while the southern portion of the property was observed to slope to the east and south. Stormwater occurring on the subject site would discharge both to the north and south and then toward unnamed tributaries to Leon Creek.

Using U.S. Geological Survey Water-Resources Investigations Report 95-4030 it was determined that the northern portion of the subject site is underlain by the Basal Nodular Member of the Kainer Formation of the Edwards Aquifer, and the southern portion of the subject site is underlain by the Dolomitic Member of the Kainer Formation of the Edwards Aquifer.

The Basal Nodular Member of the Kainer Formation is characterized by stratigraphically controlled permeability with significant conduit flow at the surface. This member is approximately 50 to 60 feet thick. This unit is considered to be part of the lower confining unit of the Edwards Aquifer. This member includes negligible permeability and is considered the bottom of the Edwards Aquifer. Areas of the site occupied by the Basal Nodular Member were also dominated by areas of fill and construction debris, which obscures definite field identification.

The Dolomitic Member of the Kainer Formation is characterized by the presence of massively bedded mudstone, grainstone, and recrystallized limestone with abundant chert nodules. The full section thickness of this member is approximately 110 to 130 feet thick. This member produces moderate amounts of water, and includes moderate porosity but intermediate or lower permeability, and has a moderate environmental sensitivity. Rock exposure throughout the southern portion of the subject site exhibited characteristics of this member.

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, Hilly (TaD).

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 very shallow to a veneer in places with exposed bedrock.

No geologically sensitive 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 60% on the approximately 16.48-acre portion of the site in the Edwards Aquifer Recharge Zone.
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.


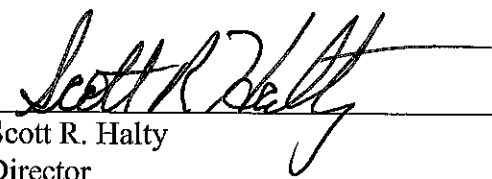
4. Landscaped areas shall be sensitive to minimizing water needs, i.e., use of native plants. Each purchaser of an individual lot or tenant within this development shall be informed by the seller or lessor in writing about Best Management Practices (BMP) for pesticide and fertilizer application. Preventing 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**

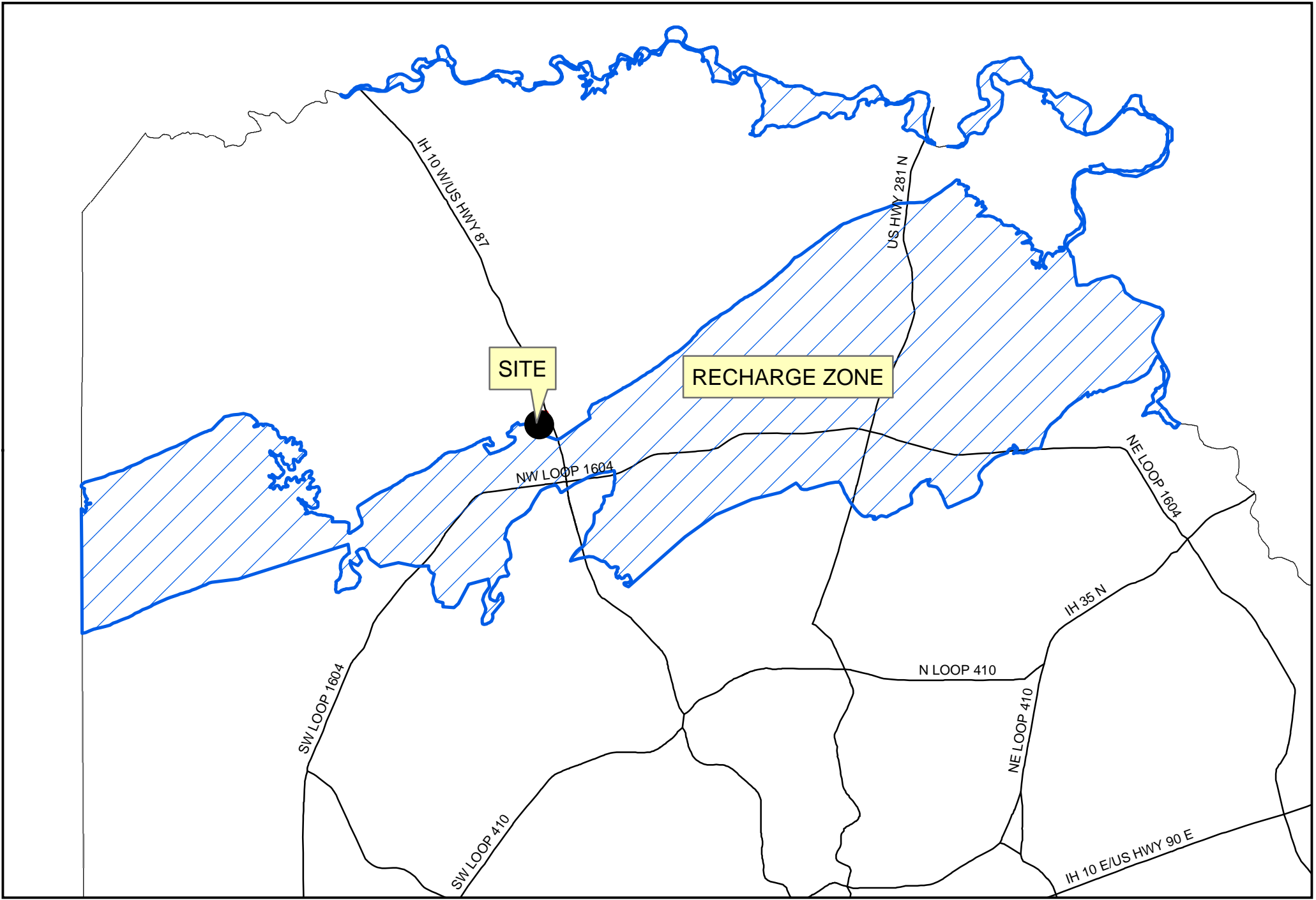
1. The City of San Antonio shall inspect all future construction of the sewage collection system to include service laterals and sewer mains for proper construction according to State and City Regulations and Code.
2. Prior to the release of any building permits, the following shall be submitted to the SAWS Aquifer Protection & Evaluation Section of the Resource Protection Division:
  - A. A copy of 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:

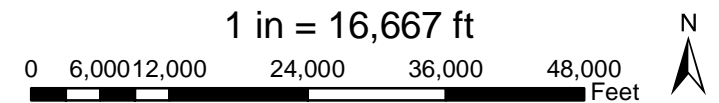
  
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Andrew Wiatrek  
Manager  
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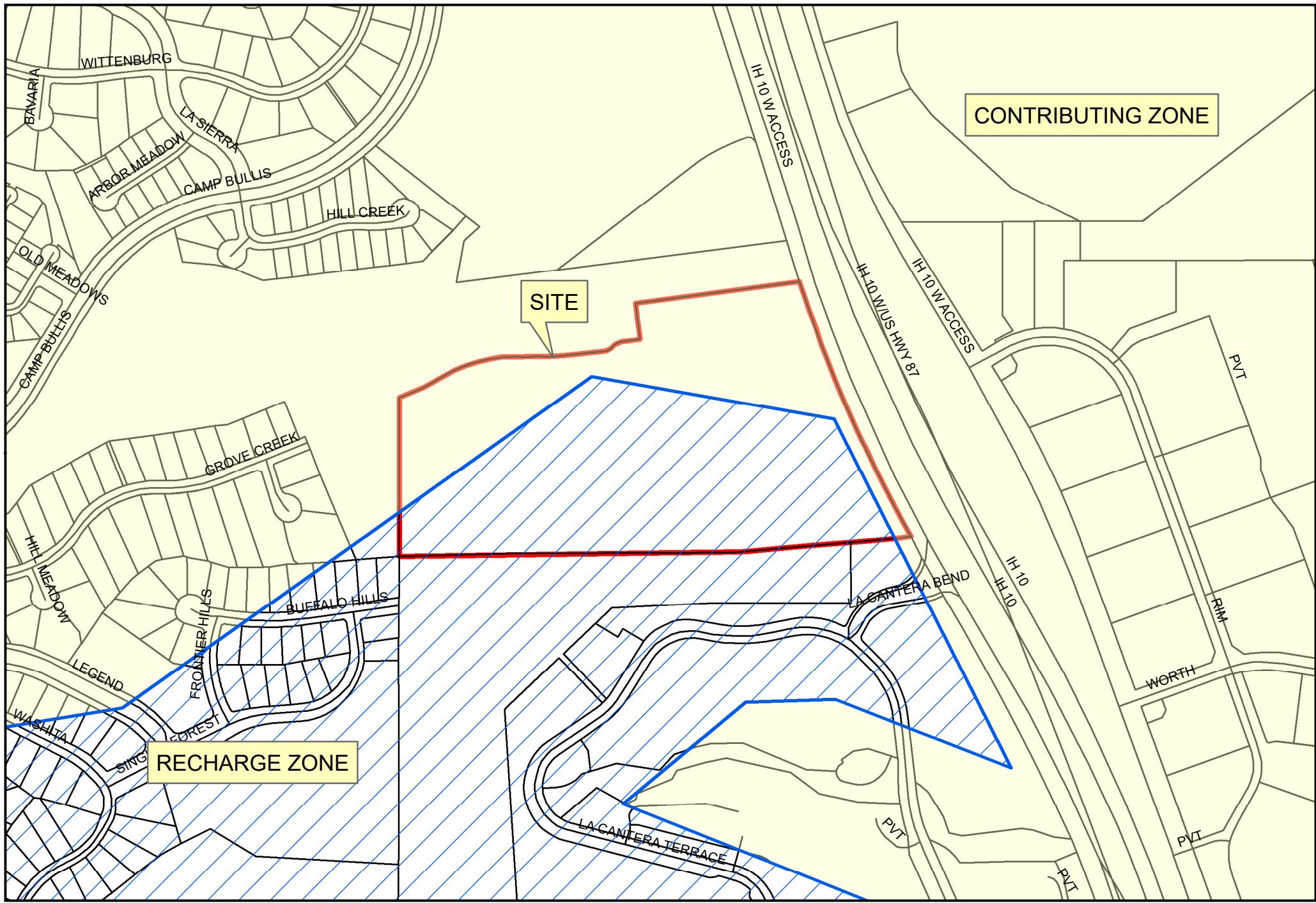
MJB:MAE



ZONING CASE: I-10 CANTERA RIM MXD (FIGURE 1)  
ZONING FILE: Z2022-10700272

Map Prepared by SAWS, Resource Protection & Compliance Dept. MAE 9/22/2022





ZONING CASE: I-10 CANTERA RIM MXD (FIGURE 2)  
ZONING FILE: Z2022-10700272

Map Prepared by SAWS, Resource Protection & Compliance Dept. MAE 12/9/2022

