



9830 Colonnade Boulevard, Suite 300, San Antonio, Texas 78230
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3/13/2023

Environmental Variance Request Review
c/o Development Services Staff
Development Services Department
City of San Antonio
1901 S. Alamo
San Antonio, TX 78204

Re: Environmental Variance Request: CIP SAWS Woodlands Floodplain Tree
TRE-APP-APP21-38801317
35-523(f)

Dear COSA DSD,

Within the Floodplain and Environmentally sensitive areas, 100% of heritage trees must be preserved in accordance with UDC Section 523-35(h). Per UDC Section 35-523(f) table-1A significant trees shall be preserved at no less than 80% within both the 100yr floodplain and environmentally sensitive areas. Mitigation is prohibited in floodplains and environmentally sensitive areas except when a variance is granted by the planning commission. The Woodland Group, LLC is requesting an Environmental Variance Request (Variance) for the removal of more than 20% significant and removal of any heritage trees per Unified Development Code (UDC) Table 523-1A within limits of the existing Floodplain. The Proposed Woodlands Subdivision (Units 1-4) is 195.6 acres which will consist of approximately 814 homes in northwest San Antonio north of the intersection of FM 1283 and Red Wing Rd (See attached exhibit).

The Woodlands at Medina Hills Subdivision is located within Medina County and San Antonio ETJ. The development is included within a PID (Public Infrastructure Development) with Medina County and consists of residential development and infrastructure improvements. The COSA Major Throughfare Plan requires a culvert crossing located within the limits of the floodplain. See attached exhibit that identifies the areas for these homes and the separate tree preservation plan for the floodplain permit. The residential development was master planned with the current floodplain limits at the time of the agreement. Subsequently, the limits of the floodplain limits have changed resulting with proposed lots located within the new floodplain limits. The limits shown on the Tree Preservation are based on a that is provided for the development. To stay consist with the PID agreement, which was approve and signed by the City Manager of the City of San Antonio, we are proposing to place fill within the limits of the floodplain which results in the removal of significant and heritage trees within the floodplain and environmentally sensitive areas. Also, to stay consist with the PID agreement, the area that contains the floodplain is area that has already been deeded over to Medina County as part of the PID agreement.

Regarding UDC Section 35-523(f)(2) table 523-1A – The maximum mitigation percentage up to 80% of the significant trees may be mitigated rather than preserved. We are requesting to provide mitigation for preserving 59.4% of the significant trees within the Environmental Sensitive Buffer area. See breakdown of presentation percentages and proposed planting for summary of variance request.

Regarding UDC Section 35-523(f)(2) table 523-1A – 100% of the heritage trees are to be preserved. We are requesting to provide mitigation for preserving 78% of the heritage trees. Per the above referenced tree plan, we are proposing to remove Live Oak heritage trees that would need to be mitigated at 3:1. This would result the need to mitigate to account for the removal of heritage trees with the limits of the tree plan. See breakdown of presentation percentages and proposed planting for summary of this variance request.

To mitigate for the removal of these trees we are proposing to upsize all trees from 1.5” to 2” on all lots that are already being planted per Approved Tree Plan APP21-3880750. The newly upsized trees will be selected per COSA UDC Appendix E and no more than 25% of the replacement trees shall be of the same species for the purpose of mitigation. With all 4 upsized trees per lot, each lot which the subdivision will have 4-2” trees. See breakdown of presentation percentages and proposed planting for summary of AEVR request. The disturbed areas will be drill seeded with native seed mix ensuring 85% establishment.

		ESA (Inches)	Floodplain (Inches)
Significant	Total	3182	21088
	Preserved	1889	18719
	Removed	1386	3237
	% Preserved	59.4%	88.8%
	Mitigation	656	*(1849)
Heritage	Total	0	1547
	Preserved	0	1205
	Removed	0	342
	% Preserved	0%	78%
	Mitigation	0	974
Total Mitigation / *(Excess) In		656	*(875)

Total mitigation required = 656”. Upsizing all trees to 2” trees on all lots = 1628”

*note: There is a surplus of 1,848.7 inches due to persevering over 80%. This surplus of inches is applied to the heritage migration requirements. (1,849-974 = 875 excess)



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The following factors should be considered to validate this variance request considering the removal trees located on site would not contribute to adverse operations and environmental impacts on the public health, safety, and public welfare:

- We are needing to construct roadway and drainage improvements per the COSA Major Throughfare Plan. The culvert crossing was designed to minimize the area of disturbance and grading required for the construction of the crossing.
- We are staying consist with the city approved PID agreement associated with the project.

The applicant has taken all practical measures to minimize any adverse impacts on the public health, safety, and public welfare. In addition, the criteria of the UDC Section 35-483(e) are satisfied according to the following:

- The hardship relates to the applicant's land, rather than personal circumstances; and
- The hardship is unique, or nearly so, rather than one shared by many surrounding properties; and
- The hardship is not the result of the applicant's own actions.
- The granting of the exception/variance will not be injurious to other property and will not prevent the orderly subdivision of other property in the area in accordance with these regulations.

In our professional opinion, the proposed environmental variance remains in harmony with the spirit and intent of the UDC as it will not adversely affect the health, safety, or welfare of the public.

We appreciate your time and consideration of this matter. If you should have any further questions or require additional information, please contact our office.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Rick Gray', written over a horizontal line.

Rick Gray, PE
LJA Engineering, Inc.

A handwritten signature in blue ink, appearing to read 'Lee Baker, III', written over a horizontal line.

Lee Baker, III
The Woodlands Group, LLC



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Attachment(s)

For Office Use Only:	AEVR #:	_____	Date Received:	_____
DSD – Director Official Action:				
<input type="checkbox"/> APPROVED	<input type="checkbox"/> APPROVED W/ COMMENTS	<input type="checkbox"/> DENIED		
Signature:	_____	Date:	_____	
Printed Name:	_____	Title:	_____	
Comments:	_____ _____ _____			