



## PUBLIC WORKS

January 24, 2024

Andrew Guinn  
Property Owner  
Bulletfund I, LLC.  
5308 Broadway St  
San Antonio, Tx 78209

**Re: Floodplain Variance AEVR#23-44400552  
FPDP #2024145 for Plat#23-11800151  
4103 W Commerce St**

Dear Mr. Guinn,

The Public Works Department Storm Water Division has been in review of Plat# 23-11800151 and Floodplain Development Permit (FPDP) #2024145 associated with the proposed redevelopment at 4103 W. Commerce Street. The proposed redevelopment of the subject site is not in compliance with the current City of San Antonio Unified Development Code (UDC) Appendix F – Floodplains.

1. The proposed development does not meet the following UDC requirements:

- Appendix F, Section 35-F124(f)(18), which indicates that “parking lot construction where water depths do not exceed 6” within the parking stalls during a regulatory 1% annual chance storm event. Water depths within drive lanes may exceed 6” if depth and velocity are within the “Proceed with Caution” zone shown in Chapter 35, Appendix H, Figure 4.3.1C during a regulatory 1% annual chance storm event or if the flooded drive lane does not prevent ingress/egress from the site.”
- Appendix F, Section 35-F125 (a)(3), which indicates the prohibited development within the regulatory floodplain where “street or access construction that does not meet the requirements of Chapter 35, Appendix H, Section 6.2.9”.
- Appendix F, Section 35-F124(f)(21)( C), for floodplain reclamation which states “effective floodplain reclamation in overbank areas subject to extensive shallow (0’-3’) flooding where velocities in the overbank area are less than 3 fps and

where floodplain storage volume lost to reclamation is offset by comparable excavation within the same creek floodplain.”

2. A variance to the above UDC requirements will be required by Public Works Storm Water Division prior to approval of the plat, any building permits, and issuance of the Floodplain Development Permit (FPDP).
3. The applicant has provided the following information to assist with the review of the variance to the above UDC requirements:
  - The applicant’s engineer has provided a detailed flood study with the plat application to show that by redeveloping the site to be a storage unit and raising the building to be at a minimum of 1 foot above the 100-year ultimate water surface elevation.
  - The applicant has provided a preliminary grading plan showing the max fill on the subject site will only be for raising the building to be 1 foot above the 100-year ultimate water surface elevation.
4. Public Works will support a variance to the above UDC requirements with the following conditions:
  - Once a final site plan has been determined, the engineer of record and/or applicant shall provide an updated flood study at time of permitting to confirm no additional fill, other than needed to raise the proposed building to meet freeboard requirements.
  - Flood signage in the parking lot and drive isles will be required. Additionally, the owner/property manager will be responsible for locking the gate to the self-storage during expected rain events to prevent customers from accessing the property. This will be required to be documented at time of building permit.
  - The engineer has demonstrated that there are no adverse impacts upstream or downstream within the 100-year floodplain.
  - Low Impact Development will be required for the property to mitigate any onsite, localized drainage to prevent any adverse impacts within the public ROW.
  - Construction activities associated with the project within the FEMA designated floodplain shall not commence prior to approval of a building permit and FPDP submitted to and approved by the Public Works Storm Water.

If the Variance is approved by the Planning Commission, Public Works Storm Water Division will issue a floodplain development permit once the above conditions are met. If you have further questions or require any further assistance and/or information, please contact Sabrina Santiago at (210) 207-0182 or [sabrina.santiago@sanantonio.gov](mailto:sabrina.santiago@sanantonio.gov).

Sincerely,

*Sabrina Santiago*

Sabrina Santiago, CFM  
Storm Water Engineering Manager/Floodplain Administrator

Attachments: AEVR #23-44400552 Variance Application  
Variance Request Hardship Letter  
Denied FPDP #2024145  
Preliminary Grading plan

cc: Roberto Reyna, PE, CFM Assistant Director, Public Works Storm Water Division  
City of San Antonio, Planning Commission