

January 17, 2024

City of San Antonio
Development Services Department
Administrative Exception / Variance Request Review
Attn: Public Works – Storm Water
1901 S. Alamo
San Antonio, TX 78204

Re: 4103 W. Commerce (Reference PLAT NO. 23-11800151, SWE 39340)
4103 W. Commerce
San Antonio, TX 78207
Floodplain Ordinance 35-F125 (a)(3)
Floodplain Ordinance 35-F124 (f)18
Floodplain Ordinance 35-F124 (f)21C

- Administrative Exception
- Environmental Variance
- Subdivision Platting Variance – Time Extension

To whom it may concern:

4103 W. Commerce is a proposed self storage facility on a 1.7-acre tract in San Antonio, TX. Currently the property is being re-platted to remove utility easements from the property. As the platting process within the City of San Antonio includes review of drainage conditions, a flood study has been submitted for approval since the property is fully located within Zone AE of the effective FEMA floodplain. During the review process, COSA Public Works staff has identified the development does not meet certain UDC requirements. As discussed below, the purpose of this letter is to request formal variance approval in order to obtain approval of the plat and associated flood study.

The first code we are seeking a variance from is Floodplain Ordinance 35-F125 Prohibited Development Within The regulatory Floodplain (a)(3) Street or access construction that does not meet the requirements of 35-H6.2.9. This property and all adjacent streets are fully within the 100-year floodplain. Adherence to this section of the code would prevent access. A variance to this section is the minimum necessary to afford relief and allow access to the property and failure to grant this variance would create a hardship that prevents use of the property. The property is currently developed as an Automotive Garage, restaurant, used car sales, and businesses with an approximate 85 peak hour trips. The proposed redevelopment to self-storage will reduce the peak hour trips to approximately 30 thereby, reducing the risk to life and safety. Additionally, with the proposed development being self storage, the likelihood of the public wanting to access the site during a rain event is very minimal.

Similar to the first request, Floodplain Ordinance 35-F124 (f)18 requires construction of parking lots to “not exceed six (6) inches within parking stalls during a regulatory 1% annual change storm event”. Based on the submitted flood study, flooding within the parking lot will average 4’ of depth during a 100-yr storm event. Adherence to this section of the code would prevent parking of any kind on the property. A variance to this section is the minimum necessary to afford relief and allow access to the property and failure to grant this variance would create a hardship that prevents use of the property. The property is currently developed as an Automotive Garage, restaurant, and used car sales with an approximate 35+ parking spaces. The proposed redevelopment to self-storage will reduce the required parking spaces to six (6) thereby, reducing the risk to life, safety and personal property. Additionally, signage is proposed to be placed in the public area around the

development warning visitors and tenants that the area is subject to flooding. As the development is only for conditioned self storage, there will not be any boat and/or RVs onsite that could become floatation hazards.

Lastly, the last variance request is in reference to Floodplain Ordinance 35-F124 (f)21C, which states floodplain reclamation is allowed where “effective floodplain reclamation in overbank areas subject to extensive shallow (0’—3’) flooding where velocities in the overbank area are less than three (3) fps and where floodplain storage volume lost to reclamation is offset by comparable excavation within the same creek floodplain”. Based on preliminary grading for the project, it’s anticipated there will be a ±6,900 CY net increase of fill below the studied 100-year water surface elevation. Hydrology and hydraulic models have been prepared and approved that confirm ±6,900 CY of fill will not cause a measurable increase to the peak discharge or regulatory flood elevation, and will not cause an increase to the depth or width of the floodplain on adjacent properties. Given the site topography there is no opportunity to provide compensatory excavation within the site boundary. Additionally, there is insufficient right-of-way within Apache Creek, a jurisdictional waterway, in order to mitigate the fill offsite. A variance to this section is the minimum necessary to afford relief and allow access to the property and failure to grant this variance would create a hardship that prevents use of the property.

It should be noted the proposed development will include for Low Impact Development (LID) features to promote infiltration of run off and protect water quality. This, coupled with redevelopment that includes removal of the existing vehicle storage and automotive garage, will beautify the area and improve water quality leaving the site.

The requested variances of the COSA TCI Storm Water Design Criteria Manual & Floodplain Ordinance is satisfied according to the following.

- If the applicant complies strictly with the provisions of these regulations, he/she can make no use of his/her property.
 - These variances are the minimum necessary to afford relief.
- The hardship relates to the applicant’s land, rather than personal circumstances.
 - These variances are the minimum necessary to afford relief.
- The hardship is unique, or nearly so, rather than one shared by many surrounding properties.
 - This hardship is unique to the area due to the inadequate capacity of Apache Creek to convey flood waters, and a lack of right-of-way to mitigate increases within the existing channel.
 - Exception hardship to the applicant.
- The hardship is not the result of the applicant’s own actions.
 - This hardship is due to inadequate regional flood conveyance outside of the applicants property.
- The granting of the exception/variance will not be injurious to other property and will not prevent the orderly subdivision of the other property in the area in accordance with these regulations.
 - It is understood that surrounding residential homes are within the effective FEMA floodplain. HEC-RAS Hydraulic models have been prepared to verify that the proposed development, including the associated fill necessary, will not cause an increase to the depth or width of the floodplain on adjacent properties.
 - The property is currently developed with high intensity uses. Redevelopment will reduce the risk to life, safety, and personal property.
 - The variance will not result in increased flood heights, cause an additional threat to public safety, result in extraordinary public expense, create nuisances, cause fraud on or victimization of the public, or conflict with existing local laws or ordinances.

In our professional opinion, the proposed 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 further questions or require additional information, please contact our office.

Sincerely,



Christopher Otto (Owner's Representative)
KFW Engineers

Enclosures: WSE and Velocity Comparison Tables

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: _____	_____	
_____	_____	

**4103 W. Commerce Street Flood Study
Apache Creek
WSE and Velocity Comparison Table
Duplicate Effective vs. Corrected Effective**



River Sta.	PROFILE: 100 YEAR						PROFILE: 100 YEAR FUTURE DEVELOPMENT					
	W.S. Elevation (ft)			Velocity (ft/s)			W.S. Elevation (ft)			Velocity (ft/s)		
	Duplicate Effective	Corrected Effective	Δ	Duplicate Effective	Corrected Effective	Δ	Duplicate Effective	Corrected Effective	Δ	Duplicate Effective	Corrected Effective	Δ
22199	679.99	679.99	0.00	9.16	9.16	0.00	679.99	679.99	0.00	9.16	9.16	0.00
21979	677.40	677.40	0.00	13.78	13.78	0.00	677.40	677.40	0.00	13.78	13.78	0.00
21846	676.46	676.46	0.00	13.61	13.61	0.00	676.46	676.46	0.00	13.61	13.61	0.00
21644	675.70	675.70	0.00	12.15	12.15	0.00	675.70	675.70	0.00	12.15	12.15	0.00
21421	674.23	674.23	0.00	10.59	10.59	0.00	674.23	674.23	0.00	10.59	10.59	0.00
21317	673.41	673.41	0.00	11.45	11.45	0.00	674.04	674.04	0.00	9.81	9.81	0.00
21207	673.47	673.52	0.05	6.75	6.64	-0.11	673.57	673.60	0.03	6.55	6.49	-0.06
21176	673.06	673.14	0.08	7.36	7.20	-0.16	673.20	673.24	0.04	7.09	7.01	-0.08
20952	673.02	673.10	0.08	6.70	6.54	-0.16	673.17	673.21	0.04	6.40	6.32	-0.08
20734	673.14	673.21	0.07	4.29	4.23	-0.06	673.28	673.31	0.03	4.17	4.14	-0.03
20465	673.07	673.14	0.07	4.73	4.67	-0.06	673.21	673.24	0.03	4.61	4.58	-0.03
20370	673.08	673.15	0.07	4.36	4.31	-0.05	673.22	673.25	0.03	4.27	4.24	-0.03
20293	673.11	673.19	0.08	2.97	2.94	-0.03	673.25	673.29	0.04	2.91	2.89	-0.02
20160	673.09	673.16	0.07	3.15	3.12	-0.03	673.21	673.26	0.05	3.09	3.06	-0.03
20009	673.11	673.17	0.06	2.34	2.31	-0.03	673.23	673.27	0.04	2.29	2.27	-0.02
19989	673.11	673.17	0.06	2.14	2.12	-0.02	673.23	673.28	0.05	2.10	2.08	-0.02
19697	673.06	673.12	0.06	2.11	2.09	-0.02	673.18	673.23	0.05	2.07	2.06	-0.01
19274	671.11	671.23	0.12	9.85	9.74	-0.11	671.19	671.28	0.09	9.99	9.89	-0.10
18873	671.09	671.21	0.12	5.85	5.77	-0.08	671.16	671.29	0.13	5.96	5.81	-0.15
18692	670.91	671.05	0.14	6.13	5.96	-0.17	670.99	671.13	0.14	6.17	6.00	-0.17
18463	670.79	670.92	0.13	5.50	5.65	0.15	670.88	671.00	0.12	5.52	5.68	0.16
18384	670.75	670.81	0.06	5.40	5.95	0.55	670.83	670.89	0.06	5.41	5.98	0.57
18295	670.71	670.81	0.10	4.97	4.89	-0.08	670.80	670.88	0.08	4.98	4.91	-0.07
18185	670.33	670.43	0.10	4.98	5.01	0.03	670.42	670.51	0.09	5.00	5.03	0.03
18052	670.24	670.32	0.08	4.83	5.08	0.25	670.33	670.40	0.07	4.85	5.10	0.25
18022	670.19	670.28	0.09	5.32	5.51	0.19	670.27	670.36	0.09	5.40	5.52	0.12
18006	670.05	670.11	0.06	5.38	5.78	0.40	670.13	670.19	0.06	5.41	5.78	0.37
17808	669.80	669.80	0.00	5.63	5.87	0.24	669.89	669.89	0.00	5.65	5.88	0.23
17429	669.59	669.59	0.00	4.58	4.58	0.00	669.67	669.67	0.00	4.60	4.60	0.00
17106	669.37	669.37	0.00	5.10	5.10	0.00	669.46	669.46	0.00	5.12	5.12	0.00
Cross Sections highlighted in yellow intersect the proposed project												

**4103 W. Commerce Street Flood Study
Apache Creek
WSE and Velocity Comparison Table
Corrected Effective vs. Post-Project**



River Sta.	PROFILE: 100 YEAR						PROFILE: 100 YEAR FUTURE DEVELOPMENT					
	W.S. Elevation (ft)			Velocity (ft/s)			W.S. Elevation (ft)			Velocity (ft/s)		
	Corrected Effective	Post-Project	Δ	Corrected Effective	Post-Project	Δ	Corrected Effective	Post-Project	Δ	Corrected Effective	Post-Project	Δ
20009	673.17	673.17	0.00	2.31	2.31	0.00	673.27	673.27	0.00	2.27	2.27	0.00
19989	673.17	673.17	0.00	2.12	2.12	0.00	673.28	673.27	-0.01	2.08	2.08	0.00
19697	673.12	673.12	0.00	2.09	2.09	0.00	673.23	673.23	0.00	2.06	2.06	0.00
19274	671.23	671.22	-0.01	9.74	9.74	0.00	671.28	671.28	0.00	9.89	9.89	0.00
18873	671.21	671.21	0.00	5.77	5.77	0.00	671.29	671.29	0.00	5.81	5.82	0.01
18692	671.05	671.05	0.00	5.96	5.96	0.00	671.13	671.13	0.00	6.00	6.01	0.01
18463	670.92	670.90	-0.02	5.65	5.77	0.12	671.00	670.98	-0.02	5.68	5.81	0.13
18384	670.81	670.81	0.00	5.95	5.92	-0.03	670.89	670.89	0.00	5.98	5.95	-0.03
18295	670.81	670.81	0.00	4.89	4.89	0.00	670.88	670.88	0.00	4.91	4.91	0.00
18185	670.43	670.43	0.00	5.01	5.01	0.00	670.51	670.51	0.00	5.03	5.03	0.00
18052	670.32	670.32	0.00	5.08	5.08	0.00	670.40	670.40	0.00	5.10	5.10	0.00
18022	670.28	670.28	0.00	5.51	5.51	0.00	670.36	670.36	0.00	5.52	5.52	0.00
18006	670.11	670.11	0.00	5.78	5.78	0.00	670.19	670.19	0.00	5.78	5.78	0.00
17808	669.80	669.80	0.00	5.87	5.87	0.00	669.89	669.89	0.00	5.88	5.88	0.00
17429	669.59	669.59	0.00	4.58	4.58	0.00	669.67	669.67	0.00	4.60	4.60	0.00
17106	669.37	669.37	0.00	5.10	5.10	0.00	669.46	669.46	0.00	5.12	5.12	0.00
Cross Sections highlighted in yellow intersect the proposed project												