



November 1, 2021

Administrative Exception/Variance Request Review
City of San Antonio
Development Services Department
City of San Antonio
1901 S. Alamo
San Antonio, TX 78204

RE: **SAT 14 Data Center**
Project #: 21-39801977
UDC Section 35-523
Environmental Variance

Dear Development Services,

The SAT 14 Data Center is a 33-acre data center project located on Wiseman Boulevard in the Westover Hills neighborhood. Based on project-specific requirements to adjust grades and provide for the facility, we are requesting consideration for an administrative exception to preserve fewer than the 20% minimum existing trees as stated in 35-523, Table 523-1A "Mitigation Maximum".

Landscape drawings accompany this letter. The site currently contains 2727 total trees. Of this, 19 trees are Heritage class, 2,155 are Significant class, 52 are Understory class, and 501 are Non-significant. Of these trees, the project is able to preserve one (1) Heritage class tree (24 inches, 4.49% of total Heritage trees), sixty-eight (68) Significant class trees (606 inches, 3.02% of total Significant trees), and sixteen (16) Non-significant trees (91 inches, 2.94% of total Non-significant trees) for a total of 3.01% of existing trees preserved. **The project is requesting administrative exception to mitigate for 96.99% of existing trees, beyond the 80% maximum allowed under 35-523, Table 523-1A.**

In total, 8,964.2 inches are proposed to be removed and mitigated (after the credit of 91 inches for preserved Understory trees). The project will provide mitigation in the form of 1,836 total new caliper inches beyond what is required for bufferyard planting and parking lot shading. Additional mitigation for the remaining 7,386.2 caliper inches to be mitigated will be paid by owner at \$200 per inch for a total of \$1,477,240.00.

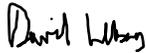
The site is not developable for the proposed use by the owner without substantial re-grading of nearly the entire area of the site to accommodate building pads and circulation, and the trenches that will be required for the numerous underground utilities required to serve the development, necessitating the removal of existing trees. The design accommodates CPS requirements for electrical easement access along the western, northern and eastern edges of the site and within fifty feet of transmission lines along Wiseman, requiring the removal of existing trees for utility operations and limiting the mitigation planting of new trees in those areas. The security requirements for the project require a minimum of ten feet of space between the security fence and new or existing trees to prevent the fence from being scaled and to allow for line-of-sight security from the interior security road to the outside of the fence. The design team has made every reasonable effort to preserve existing trees in areas unconstrained by grading or future utility conflicts. This hardship is unique to the specific programming requirements for the site and is not shared by many surrounding properties.

The granting of this exception will not be injurious to other properties. The design team is providing bufferyard planting beyond what is required by code to provide for the spirit of the UDC and welfare of the public and present planting sizes and numbers beyond what is required by code to all public-facing portions of the property, including fronting residential areas.

The project extends bufferyards to all sides of the project, including facing properties that do not trigger bufferyard requirements. Additionally, all new shade trees will be 3-4" in caliber instead of the minimum 1.5" caliber required under 35-511, Table 511-1. Tree plantings are intended to provide long-term resilience through biodiversity. The project will further minimize new turf areas and will provide for large areas of wildflower and native prairie grasses; these areas will receive temporary irrigation for establishment but no permanent irrigation. The project is pursuing LEED accreditation.

In our professional opinion, the propose administrative exception meets the spirit of the UDC by maximizing planting within the bufferyards of all sides of the property and providing landscape planting as screening for all public areas and re-establishing graded areas with native wildflowers and prairie grasses.

WALTER P. MOORE AND ASSOCIATES, INC.



David Lundberg, P.E.
Senior Engineer

Attachments: L1.0 Tree Preservation Plan
L3.0 Planting Plan