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3PV 18-0011

CITY OF SAN ANTONIO  
DEVELOPMENT  
SERVICES DIVISION

**Instructions:**

1. All applicable information must be legibly printed or typed for processing.
2. Application must include a copy of the notification and decision letter, and the rationale, in detail, for the request for appeal. Please attach additional pages as necessary. All additional pages must be numbered and labeled.
3. All signatures must be originals. Applications may not be faxed or emailed.
4. An application will not be accepted without the required application fee. All checks must be made payable to "City of San Antonio."
5. Any appeal of the decision of the Director to the Planning Commission will be based on information submitted to the Director for the related application.
6. Language interpreters are available and must be requested 48 hours prior to the meeting. For more information or to request an interpreter, call (210) 207- 6044. Hay servicios de traducción simultánea disponibles. Estos servicios deben ser pedidos con 48 horas de anticipación. Para más información o para servicios de traducción, llame al (210) 207- 6044

To the Honorable Members of the Planning Commission:

In reference to:

Project Name: Ohana Homes Assisted Living

Application Type: AEVR Application No.: \_\_\_\_\_

Address/Location: 527 E. Huisache San Antonio, TX 78212

Legal Description: Lot 26, Block 6, NCB 3090 Laurel Heights Subdivision (Vol. 105, Pg. 70, D.P.R.)

The Applicant, Grant Garbo c/o Ohana Homes Assisted Living LLC, alleges that the following error in an order, requirement, decision or determination has been made by an administrative officer in the enforcement of the City of San Antonio's Unified Development Code (UDC). *Please explain in detail by attaching a separate letter outlining the criteria below:*

As per the UDC, the appeal request letter must address the following criteria prior to submission.

1. If the applicant complies strictly with the provisions of these regulations, he/she can make no reasonable use of his/her property; and
2. The hardship relates to the applicant's land, rather than personal circumstance; and
3. The hardship is unique, or nearly so, rather than one shared by many surrounding properties; and
4. The hardship is not the result of the applicant's own actions; and
5. The granting of the 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.

**APPLICANT INFORMATION**

Business/Company Name: ADA Consulting Group, Inc.  
 Point of Contact: Donald Oroian  
 Status: Owner  Agent   
 Mailing address: \_\_\_\_\_  
 Telephone: Home/Office: ( 210 ) 340 - 5670 Mobile: ( ) -  
 Other phone: ( ) - Email: donald@adacg.com

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LAND DEVELOPMENT SERVICES DIVISION

**PROPERTY OWNER INFORMATION**

Business/Company Name: Ohana Homes Assisted Living LLC  
 Point of Contact: Grant Garbo, Its Managing Member  
 Mailing address: \_\_\_\_\_  
 Telephone: Home/Office: ( 267 ) 528 - 6976 Mobile: ( ) -  
 Other phone: ( ) - Email: gremirealestate@gmail.com

**AUTHORIZATION FROM PROPERTY OWNER**

I, Grant Garbo, Managing Member - Ohana Homes Assisted Living LLC the owner of the subject property, authorize Donald Oroian c/o ADA Consulting Group, Inc. to submit this application and represent me in this appeal before the Planning Commission.

*Grant Garbo*      *Grant Garbo*

Property owner's signature

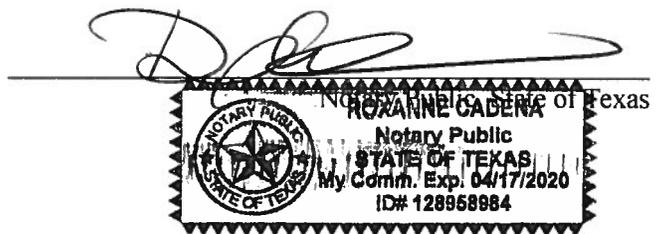
4/18/18  
Date

I, the undersigned, hereby certify that all information contained herein and the attached documents are true and correct to the best of my knowledge. I understand my continuing obligation to notify in writing the Development Services Department of the inaccuracy of any statement or representation that was incorrect when made or becomes incorrect by virtue of changed circumstances.

Donald Oroian c/o ADA Consulting Group, Inc.      *Donald Oroian*      4-20-2018  
 Applicant's Name      Applicant's signature      Date

Sworn to and subscribed before me by Donald Oroian on this 20th day of April in the year 2018, to certify which witness my hand and seal of office.

**OFFICE USE ONLY**  
 Application/Case No.: \_\_\_\_\_  
 Submittal Date: \_\_\_\_\_



**ADA CONSULTING GROUP, INC.**

221 W. RHAPSODY, STE 102 SAN ANTONIO, TX 78216  
(210) 340-5670 FAX: (210) 340-5728 WWW.ADACG.COM  
TBPB REGISTERED ENGINEERING FIRM NO. E-3512

18 APR 23 AM 9:53

LAND DEVELOPMENT  
SERVICES DIVISION

April 18, 2018

Planning Commission  
c/o: City of San Antonio  
Development Services Department  
1901 S. Alamo St.  
San Antonio, TX 78204

RE: Ohana Homes Assisted Living  
Lot 26, Block 6, NCB 3090  
Laurel Heights Subdivision  
(Vol. 105, Pg. 170, D.P.R.)  
527 E. Huisache St.  
San Antonio, TX 78212

SUB: **UDC 35-506(d)(9) – Substandard Existing Streets**  
**Table 506-4 regarding alley R.O.W./pavement width**  
Appeal to the Planning Commission

Honorable Members of the Planning Commission,

Please find this appeal to an Administrative Exception/Variance Request (AEVR) regarding our proposed project to renovate an existing single family home to include a rear addition to provide a 10 bed assisted living facility. The layout of this historic designated site depends on the use of the existing platted 19 ft alley right-of-way for vehicular access to the four onsite parking spaces. This alley does not provide the minimum 20' alley right-of-way and 10-12 ft of pavement width per UDC Table 506-4 and as such we are hereby requesting an administrative variance from improving the pavement cross-section required by UDC 35-506(d)(9)(B)(1).

While the UDC does call for the improvement of this existing alley, we feel improving the pavement cross-section of this alley should not be imposed due to the following:

1. As a long-term care assisted living facility, we are required by the Americans with Disabilities Act (ADA) Standards and Texas Accessibility Standards (TAS) Section(s) 209.3 for licensed long-term care facilities where the period of stay exceeds 24 hours. To provide a passenger loading zone for vehicular drop-off that without incorporating the rear alley cannot be done in a safe and compliant manner. Many of the lot/block configurations of CRAG area properties hinder development to some current codes and requirements as they were laid out lots/blocks that well predate those requirements. Further, as vehicular access trips will not increase as the residents do not drive with vehicular access only by the few employee caretakers and occasional

- visitors which is similar to current use (and surrounding) single family homes assuming two cars per home.
2. The alley in question currently serves as a means of access by residents and the City for 16 platted lots. Since the alley has existed for this purpose for over 100 years without regular pavement maintenance by the City, it certainly has not received enough or any complaints by the resident users or deemed a priority for improvement by the City.
  3. The subject site and abutting alley was created in 1907 by the Laurel Heights subdivision and is within an established neighborhood within the Community Revitalization Action Group (CRAG) area. By exception in UDC 35-506(d)(9)(C)(3), the right of way and pavement width requirements may be reduced by the director of development services. This exception expresses the position by the City that CRAG areas in established neighborhoods are so much more likely to pose conflict with the current UDC requirements due to their age of development far predating the UDC that it is given different consideration than similar alleys in other parts of the City.
  4. Further, our subject lot is located mid-block and imposing an improvement obligation when our lot comprises 5.5% of the alley frontage is excessive and will cause an enormous amount of off-site improvement compared to what is proposed on-site.
  5. Enabling the use of this existing rear alley for this development would be in line with the City Master Plan Urban Design, Policy 4c: *Encourage the design and use of rear alleys in residential neighborhoods to reduce "points of conflict" between automobile and pedestrian traffic.*
  6. The residents of City Council District 1 are currently underserved for assisted living facilities. When comparing the number of assisted living facilities and beds offered in zip codes predominately in District 1 (i.e. 78201, 78205, 78212, 78213, 78215) as published from the Texas Department of Health and Human Services (downloaded 4-18-2018) finds that the residents of District 1 have only 3% of the number of beds offered in Bexar County. By approving this appeal and allowing this project to move forward will result in progress towards more local aging in location living choices for the residents of District 1.

FURTHERMORE:

- ***If the applicant complies strictly with the provisions of these regulations, he/she can make no reasonable use of his/her property.***

This lot, like many lots within the CRAG area, is small with rear alley access. The incorporation of the rear alley for vehicular access is imperative to meeting the access requirements, such as the required passenger loading zone per Texas Accessibility Standards (TAS) Section 209.3 for licensed long-term care facilities where the period of stay exceeds 24 hours. Due to the 50 ft lot width the only way to provide such a passenger loading zone for vehicular drop off is to incorporate the rear alley and Huisache Street for in/out vehicular traffic.

- ***The hardship relates to the applicant's land, rather than personal circumstances.***

Applicant's land is located on a platted antiquated lot created in 1907 that designed and provided for a rear alley for use in access to the various lots of the subdivision.

- ***The hardship is unique, or nearly so, rather than one shared by many surrounding properties.***

The hardship is unique because unlike the surrounding properties that use rear alley access, this particular assisted living development requires a passenger loading zone per TAS which completely relies on the use of this rear alley for in/out vehicular traffic.

- ***The hardship is not the result of the applicant's own actions.***

The hardship is not the result of the applicants actions as this property is zoned MF-33 and allows for the proposed use of an assisted living development and the lot/block layout incorporating rear alley access was created by plat in 1907 well before the requirements of the UDC.

- ***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.***

Surrounding property is already developed and subdivided. By granting this request, the ability to provide a licensed assisted living facility to serve the surrounding area in District 1 can only be a benefit to the residents of the City as the majority of assisted living facilities in San Antonio are provided in District 9. Further, this lot (and surrounding lots) are zoned MF-33 which have the potential for multi-family residential which can potentially increase vehicular traffic however as a long-term care assisted living facility the residents do not drive thus maintaining existing vehicular traffic patterns since there will only be a few employee care-takers at any given time at this facility.

**CONCLUSION:**

In our opinion, the proposed administrative exception 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.

Sincerely,



Grant Garbo  
c/o Ohana Homes Assisted Living LLC  
Applicant / Owner



Donald Oroian, P.E.  
c/o ADA Consulting Group, Inc.  
Owner Consultant / Owner Agent

**ATTACHMENTS:**

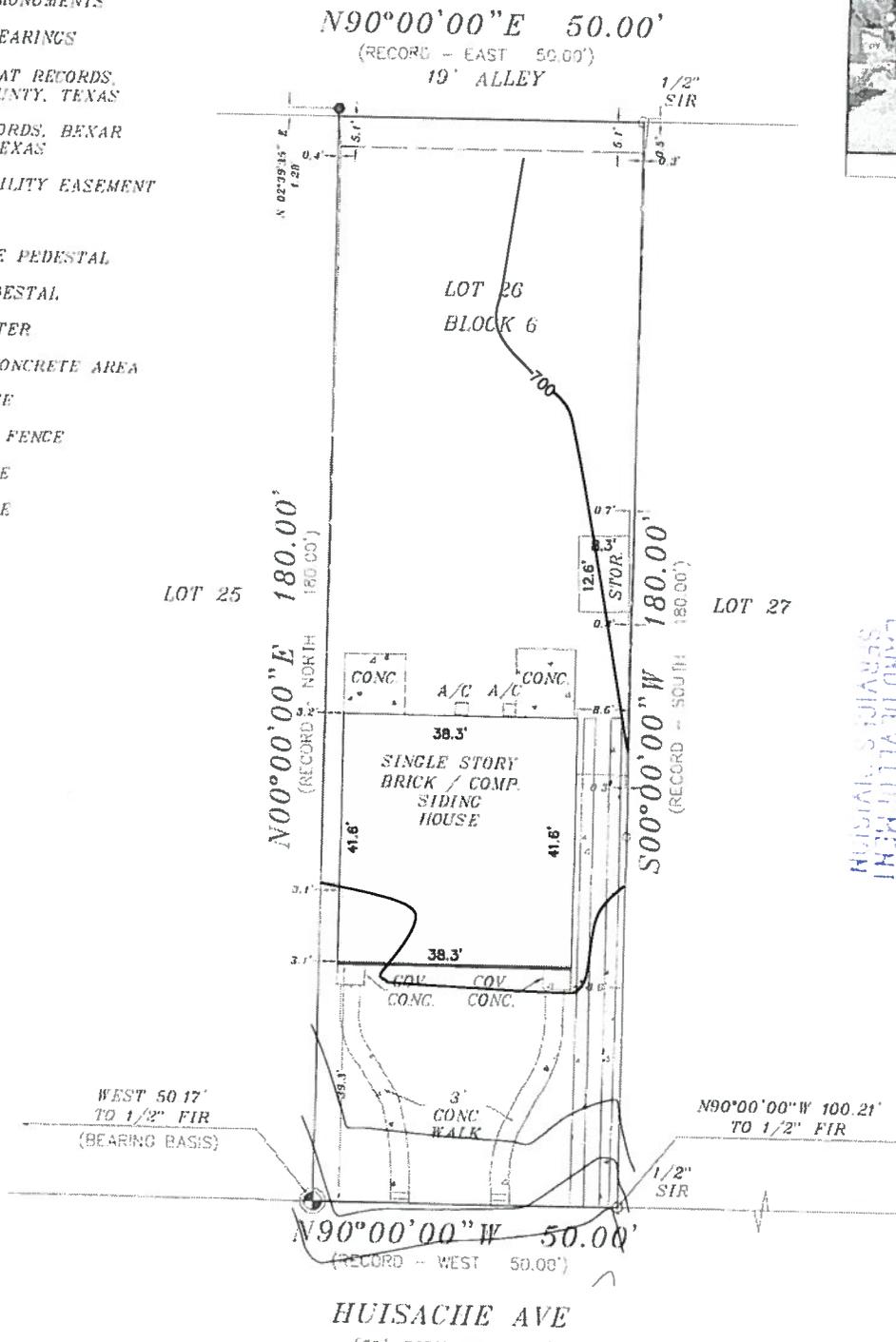
Existing Site Plan  
Proposed Site Plan  
Laurel Heights Subdivision [Vol. 105, Pg. 170, D.P.R.]

Licensed Assisted Living Facilities Directory Excerpt for Bexar County, TX *[dated 4-9-2018]*

FLOOD ZONE INTERPRETATION: IT IS THE RESPONSIBILITY OF ANY INTERESTED PERSONS TO VERIFY THE ACCURACY OF FEMA FLOOD ZONE DESIGNATION OF THIS PROPERTY WITH FEMA AND STATE AND LOCAL OFFICIALS, AND TO DETERMINE THE EFFECT THAT SUCH DESIGNATION MAY HAVE REGARDING THE INTENDED USE OF THE PROPERTY. The property made the subject of this survey appears to be included in a FEMA Flood Insurance Rate Map (FIRM), identified as Community No 48029 C, Panel No. 0405 G, which is Dated September 26, 2009. By scaling from that FIRM, it appears that all or a portion of the property may be in Flood Zone(s) X. This flood zone identification is this surveyor's interpretation, which may or may not agree with the interpretations of FEMA or state or local officials, and which may not agree with the tract's actual conditions. More information concerning FEMA's Special Flood Hazard Areas and Zones may be found at <http://www.fema.gov/index.shtm>.

**LEGEND**

- 1/2" IRON ROD FOUND
- 1/2" IRON ROD SET
- ⊙ CONTROL MONUMENTS
- ( ) RECORD BEARINGS
- MPRBCT MAP / PLAT RECORDS, BEXAR COUNTY, TEXAS
- DRBCT DEED RECORDS, BEXAR COUNTY, TEXAS
- PUE PUBLIC UTILITY EASEMENT
- T-PED TELEPHONE PEDESTAL
- C-PED CABLE PEDESTAL
- WM WATER METER
- COVERED CONCRETE AREA
- WOOD FENCE
- CHAINLINK FENCE
- WIRE FENCE
- POWER POLE
- GUY WIRE



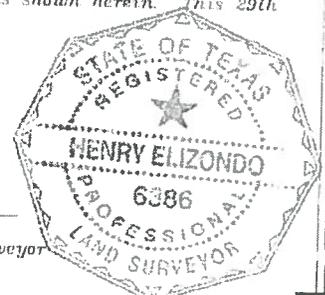
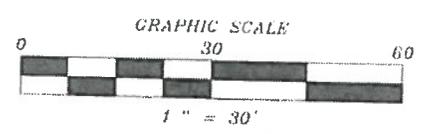
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 LAND DEVELOPMENT  
 SERVICES DIVISION

PROPOSED BORDWER: GRANT GARBO  
 PROPERTY ADDRESS: 527 E HUISACHE AVE,  
 SAN ANTONIO, TEXAS 78212

**LEGAL DESCRIPTION:**  
 LOT 26, BLOCK 6, OF LAUREL HEIGHTS, A SUBDIVISION IN BEXAR COUNTY, TEXAS ACCORDING TO PLAT THEREOF RECORDED IN VOLUME 105, PAGE(S) 170, DEED AND PLAT RECORDS, BEXAR COUNTY, TEXAS.

- Surveyor Notes:**
- UNDERGROUND UTILITY INSTALLATIONS, UNDERGROUND IMPROVEMENTS, FOUNDATIONS AND/OR OTHER UNDERGROUND STRUCTURES WERE NOT LOCATED BY THIS SURVEY.
  - THE PURPOSE OF THIS SURVEY IS FOR USE IN OBTAINING TITLE INSURANCE AND FINANCING AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES.
  - THE SURVEYOR DID NOT ABSTRACT THE SUBJECT PROPERTY. THIS SURVEY IS BASED ON DOCUMENTATION PROVIDED BY THE CLIENT AND/OR TITLE COMPANY
  - THIS PROPERTY IS SUBJECT TO RESTRICTIVE COVENANTS AND/OR EASEMENTS RECITED IN PLAT RECORDED IN VOLUME 105, PAGE(S) 170, DEED AND PLAT RECORDS, BEXAR COUNTY, TEXAS.

I, Enrique C. Elizondo, a Registered Professional Land Surveyor do hereby certify that this plat represents an actual survey made on the ground under my supervision and substantially complies with the minimum standards for land surveying in Texas as set forth by the Texas Board of Professional Land Surveying and that there are no encroachments or visible easements, to the best of my knowledge and belief, except as shown herein. This 29th day of August, 2017



*Enrique C. Elizondo*  
 Enrique C. Elizondo  
 Registered Professional Land Surveyor  
 Texas Registration No. 6386

Drawn By: TYT Job No:  
 Survey Date: 08/29/2017  
 Phone: (210) 375-4128 Fax: (210) 375-5130  
 5805 Callaghan Road Suite 109  
 San Antonio, Texas 78228  
 TEXAS LICENSED SURVEYING  
 FIRM No. 10193864  
 www.elizondoassociates.com



# CITY OF SAN ANTONIO

DEVELOPMENT SERVICES DEPARTMENT

1901 S. Alamo, San Antonio, TX 78204

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LAND DEVELOPMENT SERVICES DIVISION

## ADMINISTRATIVE EXCEPTION/VARIANCE REQUEST APPLICATION

<b>Project Name:</b>	Ohana Homes - Assisted Living
<b>A/P # /PPR # /Plat #</b>	None (AP# to be applied for)
<b>Date:</b>	April 9, 2018
<b>Code Issue:</b>	upgrade of substandard existing street(s) regarding pavement cross-section
<b>Code Sections:</b>	UDC 35-506(d)(9)

**Submitted By:**     Owner     Owners Agent \* (Requires notarized Letter of Agent)

**Owners Name:** Grant Garbo, Its Managing Member

**Company:** Ohana Homes Assisted Living LLC

**Address:** 512 W. Gramercy Place    San Antonio, TX    **Zip Code:** 78212

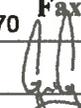
**Tel #:** (267) 525-6976    **Fax#**    **E-Mail:**

**Consultant:** Donald Oroian, PE

**Company:** ADA Consulting Group, Inc.

**Address:** 221 W. Rhapsody, Ste 102    San Antonio, TX    **Zip Code:** 78216

**Tel #:** (210) 340-5670    **Fax#** (210) 340-5728    **E-Mail:** donald@adacg.com

**Signature:**     By: Grant Garba, Managing Member - Ohana Homes Assisted Living LLC

### Additional Information – Subdivision Plat Variances & Time Extensions

1.     Time Extension     Sidewalk     Floodplain Permit     Completeness Appeal  
 Other \_\_\_\_\_

2. City Council District 1    Ferguson Map Grid 582 F8    Zoning District MF-33 H

3. San Antonio City Limits     Yes     No

4. Edwards Aquifer Recharge Zone?     Yes     No

5. Previous/existing landfill?     Yes     No

6. Parkland Greenbelts or open space? Floodplain?     Yes     No

**ADA CONSULTING GROUP, INC.**

221 W. RHAPSODY, STE 102 SAN ANTONIO, TX 78216  
(210) 340-5670 FAX: (210) 340-5728 WWW.ADACG.COM  
TBPE REGISTERED ENGINEERING FIRM NO. F-3512

April 9, 2018

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

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LAND DEVELOPMENT  
SERVICES DEPARTMENT

RE: Ohana Homes Assisted Living  
Lot 26, Block 6, NCB 3090  
Laurel Heights Subdivision  
(Vol. 105, Pg. 170, D.P.R.)  
527 E. Huisache St.  
San Antonio, TX 78212

SUB: **UDC 35-506(d)(9) – Substandard Existing Streets  
Table 506-4 regarding alley R.O.W./pavement width  
ADMINISTRATIVE EXCEPTION (AEVR)**

To Whom It May Concern:

Proposed project is the renovation of an existing single family home to include a rear addition to provide a 10 bed assisted living facility. The layout of this historic designated site depends on the use of the existing platted 19 ft alley right-of-way for vehicular access to the four onsite parking spaces. This alley does not provide the minimum 20' alley right-of-way and 10-12 ft of pavement width per UDC Table 506-4 and as such we are hereby requesting an administrative variance from improving the pavement cross-section required by UDC 35-506(d)(9)(B)(1).

While the UDC does call for the improvement of this existing alley, we feel the improving the pavement cross-section of this alley should not be imposed due to the following:

1. The alley in question currently serves as a means of access by residents and the City for 16 platted lots. Since the alley has existed for this purpose for over 100 years without regular pavement maintenance by the City, it certainly has not received complaints by the resident users or deemed a priority for improvement by the City.
2. The subject site and abutting alley was created in 1907 by the Laurel Heights subdivision and is within an established neighborhood within the Community Revitalization Action Group (CRAG) area. By exception in UDC 35-506(d)(9)(C)(3), the right of way and pavement width requirements may be reduced by the director of development services. This exception expresses the position by the City that CRAG areas in established neighborhoods are so much more likely to pose conflict with the current UDC requirements due to their age of development far predating the UDC that it is given different consideration than similar alleys in other parts of the City.

3. Enabling the use of this existing rear alley for this development is in line with the City Master Plan Urban Design, Policy 4c: *Encourage the design and use of rear alleys in residential neighborhoods to reduce "points of conflict" between automobile and pedestrian traffic.*
4. As a long-term care assisted living facility, we have an additional State requirement to provide a passenger loading zone for vehicular drop-off that without incorporating the rear alley cannot be done in a safe and compliant manner. Many of the lot/block configurations of CRAG area properties hinder development to some current codes and requirements as they were laid out lots/blocks that well predate those requirements. Further, as vehicular access trips will not increase because the residents do not drive with vehicular access only by the few employee caretakers and occasional visitors which is similar to current use (and surrounding) single family homes assuming two cars per home.

FURTHERMORE:

- ***If the applicant complies strictly with the provisions of these regulations, he/she can make no reasonable use of his/her property***

This lot, like many lots within the CRAG area, is small with rear alley access. The incorporation of the rear alley for vehicular access is imperative to meeting the access requirements, such as the required passenger loading zone per Texas Accessibility Standards (TAS) Section 209.3 for licensed long-term care facilities where the period of stay exceeds 24 hours. Due to the 50 ft lot width the only way to provide such a passenger loading zone for vehicular drop off is to incorporate the rear alley and Huisache Street for in/out vehicular traffic.

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- **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.**

Surrounding property is already developed and subdivided. By granting this request, the ability to provide a licensed assisted living facility to serve the surrounding area in District 1 can only be a benefit to the residents of the City as the majority of assisted living facilities in San Antonio are provided in District 9. Further, this lot (and surrounding lots) are zoned MF-33 which have the potential for multi-family residential which can potential increase vehicular traffic however as an long-term care assisted living facility the residents do not drive thus maintaining existing vehicular traffic patterns since there will only be a few employee care-takers at any given time at this facility.

**CONCLUSION:**

In our opinion, the proposed administrative exception 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.

Sincerely,



Grant Garbo  
c/o Ohana Homes Assisted Living LLC  
Applicant / Owner



Donald Oroian, P.E.  
c/o ADA Consulting Group, Inc.  
Owner Consultant

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SERVICES DIVISION

Attachments: Existing Site Plan  
Proposed Site Plan  
Laurel Heights Subdivision [Vol. 105, Pg. 170, D.P.R.]

<b>For Office Use Only:</b>		AEVR #: _____	Date Received: _____
<b><u>DSD – Director Official Action:</u></b>			
<input type="checkbox"/> APPROVED		<input type="checkbox"/> APPROVED W/ COMMENTS	
		<input checked="" type="checkbox"/> DENIED	
Signature: _____	_____		Date: 4/13/18
Printed Name: <u>Manuel Marquez</u>	Title: <u>Engineer</u>		
Comments: _____	_____		

REMIT TO:  
CITY OF SAN ANTONIO - DEV SVCS-1901 S. ALAMO  
1901 S ALAMO  
SAN ANTONIO TX 78204

I N V O I C E  
3903508

AMT ENCLOSED \_\_\_\_\_

50-05-5574  
GRANT GARBO  
512 W GRAMERCY PL  
SAN ANTONIO TX 78212

AMOUNT DUE 350.00  
INVOICE DATE 4/13/2018  
DUE DATE 4/13/2018

-----  
PHONE: (267) 525-6976

AEVR FEE NO PLAT OR AP  
OHANA HOMES ASSISTED LIVING  
FACILITY LOCATION: 1901 ALAMO ST S

-----  
INVOICE DATE INVOICE ACCOUNT DUE DATE OFFICE HOURS  
4/13/2018 3903508 50-05-5574 4/13/2018 -

-----  
LINE INDEX REF DESCRIPTION AMOUNT  
1 012880-001 VARIANCE/ADMIN EXCEPTIONFEE 350.00

PAID  
APR 13 2018  
DSD - #8

-----  
AGREEMENT DATES SERVICE DATES ORDINANCE CONTRACT DOCUMENT  
ST: 04/13/2018 CK#150 AVER OHANA HOME  
END 04/13/2018

-----  
INVOICE INFORMATION | INVOICE AMT 350.00 | PAYMENTS RECV 0.00 | TOTAL INV AMT DUE 350.00

-----  
CUSTOMER INFORMATION | OTHER AMTS DUE | TOTAL CUST AMT DUE

-----  
C I T Y O F S A N A N T O N I O  
DEV SVCS-1901 S. ALAMO 1901 S ALAMO SAN ANTONIO TX 78204

PAGE 1 OF 1



Site Plan - Proposed Option 5  
1/8" = 1'-0"

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AA1 - Site Plan Option B  
Scale As Indicated (Base Site BR304)  
synova architectural studio  
727 E. Borden, Suite 404  
San Antonio, TX 78216

Ohana Homes Assisted Living  
10000 E. Grand  
San Antonio, TX 78216  
800 San Antonio, TX  
Pre-Design  
8010 JDC08



