



November 14, 2016

Planning Commission / Tree Preservation Variance Request Review

c/o Development Services Staff

Development Services Department

City of San Antonio

1901 S. Alamo

San Antonio, TX 78204

Re: Stinson Municipal Airport- Air Traffic Control Tower AP#A2054783

UDC Code Chapter 35, (f) (3) (A) Table 523-1B and Chapter 35 (h)

Tree Preservation Variance Request

Dear COSA DSD,

The City of San Antonio (COSA) aviation department, specifically Stinson Municipal Airport, proposes to construct a new air traffic control tower (ATCT) across Six Mile creek from the existing facility. The current ATCT is located on top of the 1936 airport terminal building. The current ATCT does not provide a full-unobstructed view of all runway ends and movement areas and also does not provide adequate space to accommodate required equipment upgrades. As a result, COSA proposes to construct a new ATCT which will provide unobstructed views to all movement areas for improved safety and also allow for compliance with minimum equipment list requirements.

CITY OF SAN ANTONIO AVIATION DEPARTMENT

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Our Mission:

To innovatively manage our airports to provide a positive customer experience while supporting economic development.

Due to the proposed removal of heritage and significant trees located within the 100-year floodplain necessary to obtain a clear line of sight from the proposed air traffic control tower, COSA Stinson Airport staff request consideration for a variance from the Planning Commission to the City of San Antonio Tree Ordinance Chapter 35, (f) (3) (A) Table 523-1B, minimum preservation requirements for Tree Stand Delineation Alternatives within the regulatory floodplain and the resulting floodplain mitigation required {Chapter 35 (h)}.

The purpose of the proposed project is to improve functional efficiency by constructing a facility that meets current and future air traffic control needs as well as Federal Aviation Administration (FAA) Orders that govern such structures. The proposed project would relocate the ATCT to a new location that would provide proper height and distance for object discrimination and angle of incidence, and eliminate line of sight obstructions. The new location would also provide unobstructed line of sight to all airport movement areas. The proposed project would also meet current ATCT Building, Electrical and OSHA code requirements. The existing ATCT has a blocked line of sight to some movement areas due to the presence of other buildings and uses cameras to see these obstructed areas. In addition, it does not have adequate Object Discrimination and is nonconforming with regard to FAA Order 6480.4B, "Airport Traffic Control Tower Siting Process." The cab on the existing tower is small and the equipment room does not provide OSHA conforming space for electronic equipment.

In 2011, COSA began an Airport Master Plan and in 2012 began the Safety Risk Management Plan Process to design and construct a new ATCT. A Safety Risk Management Panel developed 7 Alternatives for the new tower site. Considerations for alternative assessment included FAA and OSHA standards/requirements in addition to historical and archaeological constraints, including the visual corridor for Mission Espada and considerations for the Mission Parkway Historic Archeological District, which required coordination with the COSA historian and the National Park Service. Alternative 1A, the proposed tower location included in this variance request, was identified as the preferred alternative during the course of the Environmental Assessment. Attached for your review and further reference/justification for the proposed project is the final Environmental Assessment prepared in December 2014 for this project and approved by the FAA on February 13, 2015. The Finding of No Significant Impact (FONSI) is also attached.

In order to address the issues outlined previously and satisfy the current and future anticipated traffic needs at Stinson, the proposed ATCT facility will include the updated and FAA compliant tower, a parking lot, and access road with a total footprint of approximately 0.17 acres. In order to provide clear navigational lines of sight to all operational and movement areas, approximately two acres of trees at four delineated sites (see attached "Site 1A & Tree trim/cu Areas- Exhibit 4B) would need to be topped or cleared.

Initial assessment of the project called for the total clearing of the two acres to provide an unobstructed view from the proposed tower cab. However, a tree assessment was performed by ISD Certified Arborists and it was determined that only large species trees would require removal in Tree trim/cut area 1 and only trees above certain heights would be removed in the other 3 areas based on the distance between onsite elevations and the line of sight from the proposed cab. Please note an additional 5 acres are proposed to have trees cleared that reach within 10- 15 feet of the line of sight to create a 15 year maintenance window for tree removal and allow Stinson to adopt a yearly brush maintenance program rather than budget for expensive yearly tree removal costs. As a result of the project's proposed tree canopy removal, tree canopy preservation in uplands is 82%, floodplain buffer preservation is 45%, and 100 year floodplain preservation is 23%.

Mitigation for these actions includes using a grinder (aka "hydro axe" or "cedar eater") which only affects the above ground portion of trees to eliminate soil disturbance. All 7 acres (defined as Tree Clearing Areas 1-7 on Sheet T1 attached) shall be reseeded with native species and sensitive riparian areas (1.5 acres total) shall also be planted with native grass bare roots to ensure quicker stabilization. Native grass species selection focused on root system capability (15 foot depth capability), riparian or upland vegetation type, as well as long term maintenance requests from Stinson staff (low maintenance native turf grass at the tower location). Please see the attached tree and landscape sheets for more detailed information.

The proposed air traffic control tower is required for the safety and wellbeing of the public and granting the administrative variance will not be contrary to the spirit and intent of the UDC/ City of San Antonio Tree Ordinance Chapter 35, (f) (3) (A) Table 523-1B and section (h) regarding mitigation in floodplains due to excessive tree removal. COSA has taken all practicable measures to minimize any adverse impacts on the public health, safety and public welfare during the design of this project. Under the circumstances, Stinson Municipal Airport staff believes the Planning Commission will agree that the public interest underlying the proposed exception to the Tree Ordinance requirements regarding tree preservation outweighs the public interest for which the variance is granted.

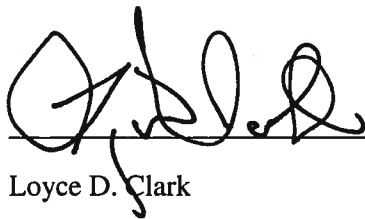
In addition, as required by the UDC for Variances UDC Section 35-483(e), please note:

- If the applicant complies strictly with the provisions of these regulations, COSA cannot perform the proposed rehabilitation of the structure and public safety will be impacted;
- The hardship relates to the applicant's land, rather than personal circumstances;
- The hardship is unique rather than one shared by many surrounding properties; and
- The hardship is not the result of the applicant's own actions; and
- 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.

In my 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 and will in fact, benefit the health, safety and welfare of the public by eliminating the current safety hazards associated with the existing air traffic control tower- obstructed line of sight to runways and airport movement areas, mandated visibility performance requirements of FAA Order 6480.4A, as well as the OSHA conforming space issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Loyce D. Clark", is written over a horizontal line.

Loyce D. Clark

Chief Asset & Planning Officer

City of San Antonio Aviation Department

Attachment(s)

For Office Use Only: #: _____

Date Received: _____

DSD – Director Official Action:

☐ APPROVED

☐ APPROVED W/ COMMENTS

☐ DENIED

Signature: _____ Date: _____

Printed Name: _____

Title: _____

Comments: _____
