



February 17, 2020

Administrative Exception / Variance Request Review
City of San Antonio
Development Services Department (DSD)
City of San Antonio (COSA)
1901 S. Alamo
San Antonio, Texas 78204

**RE: San Antonio Water System E-16: Wurzbach Parkway Sewer Project at Highway 281
A/P #2547450
Unified Development Code (UDC) 35-523
Tree Permit Application and Administration Exception / Variance Request Review**

Dear COSA DSD:

As part of SAWS Environmental Protection Agency (EPA) Consent Decree Civil Action No. 513-cv-00666-DAE the San Antonio Water System will be constructing the proposed E-16: Wurzbach Parkway Sewer Project at Highway 281 (The Project) that consists of the construction of a large sanitary sewer line beginning at the southwest corner of Wurzbach Parkway and North Loop Road, across West Avenue along Salado Creek within existing 50-foot wide SAWS sanitary sewer easement. For the limits of the construction areas, refer to sheet TP13 in the attached Tree Inventory Plan Sheets. The Project consists of a total of approximately 6,700 LF of sewer line with various diameters. The Project is expected to advertise in April 2020.

Existing site conditions: The Project includes upsizing the existing 18-inch and 27-inch sewer main and installing approximately 6,700 LF of sanitary sewer line that includes 24-inch, 27-inch, 36-inch and 78-inch diameter sewer line. The anticipated total area of disturbance is approximately 543,410 square feet (13 acres) located entirely within CoSA right-of-way, permanent easements with variable widths (varies 13-ft to 50-ft) and temporary easements with variable width (varies 10-ft to 120-ft). The Project includes both open-cut and boring/tunneling installations, however due to various constraints certain tree impacts could not be avoided.

We are requesting a variance to the requirements of section 35-523 of the UDC.

Unified Development Code (UDC). UDC Article V, Section 35-523 (h) 100-Year Floodplain(s) and Environmentally Sensitive Areas states that, "Significant trees shall be preserved at eighty (80) percent preservation within both the 100-year floodplains and environmentally sensitive areas. Heritage trees shall be preserved at one-hundred (100) percent preservation within the 100-year floodplains and environmentally sensitive areas. Mitigation shall be prohibited in floodplains and environmentally sensitive areas except when a variance is granted by the Planting Commission."

As shown in the attached engineering documents, there are portions of the sewer main alignment within the 100-year floodplain. We request consideration of this request for the following reasons:

- In an effort to minimize disturbance to the environment, the initial proposed alignment from (Sta. 47+00 to 56+50) was designed to be located outside the 100-year floodplain traversing along the upper banks through properties south of W. Rhapsody Drive. One of these properties along W. Rhapsody Drive includes the future location of a CoSA Senior Center. After multiple meetings with CoSA during design it was determined that the design requirements for both the sanitary sewer alignment and CoSA Senior Center placed the two improvements in conflict due to the topographic constraints of the property. After evaluation of the Senior Center design and sanitary sewer alignment alternatives, it was determined that the best solution for all involved parties would be to re-align the proposed sewer within the existing 50-foot SAWS easement parallel to the existing 18-inch sewer line located within the 100-year floodplain resulting in large amount of additional tree impacts within the 100-year floodplain.
- Additionally, design efforts were made to limit the impacts of The Project to Significant trees and Heritage trees through assessment of alignment alternatives and utilization of tunneling/boring. A large portion of the sewer line was relocated outside the floodplain and onto North Loop right-of-way to avoid removal of a large number of significant and heritage trees. Tunneling and boring was also utilized for this project at the following locations.
 - Sta. 24+40 to Sta. 27+70
 - Sta. 38+800 to Sta. 40+46
 - Sta. 42+46 and Sta. 45+04
- This sewer main is critical infrastructure for SAWS to continue to service the Eastern Sewer shed of San Antonio and is part of the program wide SAWS EPA Consent Decree Civil Action No. 513-cv-00666-DAE to reduce sanitary sewer overflows (SSOs).

Although preservation requirements in the Uplands and Riparian zones are met, due to the reasons listed above, the Project is unable to preserve 100% of the heritage trees within the 100-year floodplain. The resulting total mitigation for heritage trees within the 100-year floodplain is 1597 inches. The mitigation requirements for this Project can be found in the Tree Preservation Summary table on Sheet TP1 in the attached Tree Inventory Plan Sheets and summarized in the table below.

The Project is subject to the minimum tree preservation requirements stated in the Tree Preservation Ordinance – Unified Development Code (UDC) 35-523, which are given in the following table:

	100-yr Floodplain	
	Significant	Heritage
The Project	83.7% Preserved	80.1% Preserved
Requirement	80% Required	100% Required

Zone	Total (in.)	Required Preservation (in.)	Amount Preserved (in.)	Req. Mitigation (in.)	Cost (\$)*
Floodplain (Significant)	4717	3135	3919	N/A	N/A
Floodplain (Heritage)	3033	3033	2450	1597	\$ 319,400
				Total Mitigation	\$319,400

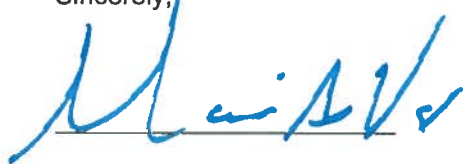
*Cost calculated based on fees for medium sized trees in Appendix C of UDC (\$200/inch)

As part of the mitigation efforts for this project, SAWS is proposing to re-seed all areas within CoSA right-of-way not within or directly adjacent to private property and all CoSA owned properties for an approximate area of 247,311 square feet (5.7 acres) with native seed mix via drill seeding technique ensuring 85% establishment of grasses. Areas excluded include paved areas and private properties for approximately 296,099 square feet.

In our professional opinion, the proposed administrative exception / 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.

For additional information or questions, contact Mario Valdez, P.E. at Mario.Valdez@kimley-horn.com or 210-321-3407.

Sincerely,



Mario Valdez, P. E.



Cristina De La Garza, P.E.

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:	_____ _____ _____		