# SAN ANTONIO WATER SYSTEM Interdepartment Correspondence Sheet

**To:** Zoning Commission Members

From: Scott R. Halty, Director, Resource Protection & Compliance Department, San Antonio

Water System

Copies To: Andrew Wiatrek, Manager, Edwards Aquifer and Watershed Protection Division,

Michael Barr, Supervisor, Aquifer Protection and Evaluation Section, Michael A.

Escalante, Environmental Protection Specialist III

Subject: Zoning Case Z2021-10700024 (Indian Woods Car Express Car Wash)

**Date:** May 6, 2021

#### **SUMMARY**

A request for a change in zoning has been made for an approximate 1-acre tract located on the city's northwest side. A change in zoning from "O-2 ERZD MLOD-1 MNA AHOD" to "C-2 S ERZD MLOD-1 MNA AHOD" is being requested by the applicant, The Rogers Shavano Ranch, Ltd., and represented by Caroline McDonald, Brown & Ortiz, P.C. The change in zoning has been requested to allow an automated carwash facility. The property is currently classified as a Category 2.

Based on the site evaluation of the property, and the information submitted by the applicant, SAWS staff recommends **approval** of the proposed land use. Should the City Council rezone the property that is the subject of this report, the San Antonio Water System recommends that any development on that property after the zoning classification has been changed should be restricted as stated in the environmental recommendations section of this report.

## **LOCATION**

The subject property is in City Council District 8, located at the southeast intersection of De Zavala Rd and Indian Woods Rd. The property lies within the Edwards Aquifer Recharge Zone (Figures 1 and 2).

# SITE EVALUATION

## 1. Development Description:

The proposed change is from "O-2 ERZD MLOD-1 MNA AHOD" to "C-2 S ERZD MLOD-1 MNA AHOD" and will allow for the development of a carwash facility on a 1-acre lot. Currently, the site is undeveloped with few native trees and undergrowth. The proposed project will consist of a drive-thru automated carwash tunnel and associated vacuum service bays.

The automatic carwash will reclaim and recycle 80% wash water, therefore minimizing freshwater usage and reducing operating costs. Review of the project proposes three 2,000-gallon concrete vaulted dual compartment settling tanks. Wash water from the carwash cycle drains into the settling tanks and the oil water separator tank: separating suspended solids (sand, silt, & grit) and heavier particles from hydrocarbon oils and floatable chemicals. Hydrocarbon oils and solids recovered within the tanks are pumped out by a licensed hauler quarterly.

The carwash detergents being used are water based and biodegradable. The storage room housing the detergents and wash equipment will have floor drains leading into the settling tanks, as well.

Velocity-VRC-TS reclaim system filters water from the second tank by removing the finest particulates using cyclone separators prior to reuse in the wash cycle. The reclaim system injects ozone to treat and prevent odors and biological growth in reuse water before recirculating the filtered water into the second settling tank to help satisfy the water balance for each wash cycle.

# 2. Surrounding Land Uses:

North of the subject property borders De Zavala Rd, with St. Vincent De Paul Ministry located beyond. To the east and to the south lies undeveloped commercial lots. Indian Woods Rd bounds to the west, with Indian Woods business park located beyond.

## 3. Water Pollution Abatement Plan:

A WPAP file under the name Shavano Ridge Retail had been previously submitted and approved by the Texas Commission on Environmental Quality (TCEQ) on June 28, 2018. An existing offsite water quality basin associated with the WPAP, was found to be compliant at the time of our site evaluation.

## 4. Geologic Conditions:

The Aquifer Protection and Evaluation Section of the San Antonio Water System conducted a site evaluation on March 5, 2021, of the referenced property to assess the geologic conditions and evaluate any environmental concerns present at the site. SAWS Environmental Geologist, Mr. Bruce Keels, P.G., was present during the site evaluation.

The subject site was observed to be an undeveloped 1-acre lot located within a retail development. The property was observed to be vegetated with few native trees and undergrowth throughout the site. No portion of the property lies within a floodplain. Stormwater occurring on the site would discharge to the south and east towards an off-site water quality basin.

Using U.S. Geological Survey Water-Resources Investigations Report 95-4030 it was determined that the subject site is underlain by the Cyclic and Marine Member of the Person Formation.

The Cyclic and Marine Member of the Person Formation is characterized by the presence of thinly bedded mudstone, packestone and grainstone with structurally based porosity. The full section thickness of this member is approximately 80 to 90 feet thick. No visual expression of the Cyclic and Marine Member of the Person Formation was observed on the site due to extensive soil cover.

No sensitive geologic features were observed on-site nor noted on file.

## **ENVIRONMENTAL CONCERNS**

The environmental concerns associated with this development being constructed on the Edwards Aquifer Recharge Zone are:

## **Site Specific Concerns**

- 1. The improper capture of detergents and chemicals used in the car wash process.
- 2. The improper storage and use of detergents and chemicals associated with the car wash process.

## **General Concerns**

- 1. The improper use of pesticides, herbicides, or fertilizers needed for landscape maintenance that may be carried off in the first flush of stormwater run-off.
- 2. The build-up of hydrocarbons and other pollutants on streets, parking lots and other paved areas that are then carried off in the first flush of stormwater run-off.

#### ENVIRONMENTAL RECOMMENDATIONS

The following recommendations address the environmental concerns raised by the construction of this development on the Edwards Aquifer Recharge Zone:

# **Site Specific Recommendations**

- 1. The impervious cover shall not exceed 65% on the 1-acre site.
- All washing areas and/or car wash bays shall have sumps with grit traps. The grit traps shall be serviced quarterly, and manifests retained on-site to ensure proper operation and prevent bypass or overflow.
- 3. The use of biodegradable detergents shall be used.
- 4. The applicant shall take measures to recapture greater than 80% of water used in the car wash process.

- 5. The applicant will participate in the SAWS WaterSaver Car Wash Program, involving SAWS conservation staff to inspect the facility for compliance with program guidelines. The applicant is required to reapply each year to the SAWS Conservation department to participate in the WaterSaver Car Wash Program and become a "Recognized WaterSaver Partner".
- 6. An interceptor(s) shall be installed in the drainage systems of the car wash bay where heavy solids or solids greater than ½ inch may be introduced into the sanitary sewer system. The sizing criteria/design approval for the interceptor shall be based on the requirements in Chapter 10 Article IX. Plumbing Code of the City of San Antonio Code of Ordinances or as amended in the International Plumbing Code.
- 7. Proper permits shall be obtained prior to the discharge of any wash water into the sanitary sewer system.
- 8. The land uses within the project site shall be in conformance with the table of permitted uses at the time the re-zoning is approved. Should a proposed use be listed as requiring City Council approval, the owner/operator shall apply for re-zoning for that particular use at the project site. If the land use is listed as special use, a special permit must be obtained for that use. If the land use is listed as not allowed, that land use will not be permitted on the project site.
- 9. The owner of all water pollution abatement structures shall ensure these structures are properly maintained and kept free of trash and debris. A signed water quality maintenance plan must be submitted to the Aquifer Protection & Evaluation Section of SAWS. If at any time the ownership of the property changes, the seller must disclose to the buyer all the requirements of the water quality maintenance plan. The new owner must submit a signed water quality maintenance plan to the Aquifer Protection & Evaluation Section of SAWS.
- 10. Landscaped areas shall be sensitive to minimizing water needs, i.e., use of native plants. Each purchaser of an individual lot or tenant within this development shall be informed by the seller or lessor in writing about Best Management Practices (BMP) for pesticide and fertilizer application. Preventing Groundwater Pollution, A Practical Guide to Pest Control, available form the Edwards Aquifer Authority (210) 222-2204, or equivalent information produced by the U.S. Natural Resource Conservation Service, Texas Department of Agriculture, U.S. Department of Agriculture, shall be used.

## **General Recommendations**

- 1. Prior to the release of any building permits the owner/operator of any Category 2 property shall submit an Aquifer Protection Plan to the Aquifer Protection & Evaluation Section of the San Antonio Water System.
- 2. The City of San Antonio shall inspect all future construction of the sewage collection system to include service laterals and sewer mains for proper construction according to State and City Regulations and Code.

3. The Resource Protection & Compliance Division staff shall have the authority to inspect the site to ensure that the approved recommendations are being strictly adhered to during and after construction of the project.

Based on the site evaluation of the property, and the information submitted by the applicant, staff recommends **approval** of the proposed land use. Additionally, SAWS staff recommends that the applicant, or any future owner, comply with the above recommendations in regards to the development of the subject property.

APPROVED:

Andrew Wiatrek

Manager

Edwards Aquifer and Watershed Protection Division

Scott R. Halty

Director

Resource Protection & Compliance Department

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