



CITY OF SAN ANTONIO  
PUBLIC WORKS DEPARTMENT

January 19, 2022

Variance Request Review<sup>1</sup>  
City of San Antonio  
Development Services  
Department 1901 S. Alamo  
San Antonio, TX 78204

Re: Brackenridge Park Tree Preservation Project  
COM-PRJ-APP21-39803985  
Sec. 35-523 (h) & Table 523-1B, Preservation  
percentage requirements within the 100-yr  
floodplain.

Dear Development Services,

The City of San Antonio Public Works department is currently managing a capital improvement project at Brackenridge Park for the Parks and Recreation Department that focuses on the rehabilitation and reconstruction of several historically significant cultural resources. SWA Group is the design consultant on the project. As project manager for the Public Works Department, I am submitting this Variance Request to the Development Services Department for review and approval.

Our main area of focus for the scope of work on this project is the northern section of Brackenridge Park between Hildebrand Ave. and the San Antonio River, located in Council District 2. The project will include the structural and aesthetic rehabilitation of several cultural resources, an event plaza, a cultural trail, an Upper Labor Dam overlook, underground conversion of electrical services, new lighting, furniture, interpretive signage, pedestrian bridges, landscaping, trees and irrigation.

The project team is requesting a variance regarding section 35-523, (h) and Table 523-1B of the Unified Development Code (UDC) that states the preservation percentage requirements for commercial developments within the 100-yr floodplain. Our understanding of that section is that at least 80% of significant trees and 100% of Heritage trees must be preserved within the 100-yr floodplain. Our current improvement plan for Brackenridge Park project does not meet those percentage requirements.

The cultural resources within this area of the park that we are proposing to address in this capital project include the Lambert Beach River walls, the Lambert Beach Steps, the Brackenridge Pump House, the Upper Labor Acequia and the Upper Labor Dam. These cultural resources are all contributing features to Brackenridge Park, which is on the National Register of Historic Places and is a State Antiquities Landmark.

This current state of the some of these cultural resources has led to them being closed off from public access and have become a health, safety and welfare issue that needs to be addressed. Different sections of these cultural resources are in multiple states of disrepair, with some sections leaning, some cracking and crumbling, and some already completely failed and fallen.

Several of these cultural resources have trees either within them or directly adjacent to them or both, making reconstruction, rehabilitation and/or repair of those resources physically impossible without major detriment to, or removal of, the adjacent trees.

To date, there have been no historic records or photographs showing that the trees proposed to be removed were part of the construction plans for any of the cultural resources. However, there are a few concave and convex areas of the WPA era river walls that suggest that the walls may have been purposely constructed around existing or proposed trees at the time. Currently, no trees exist at these locations. It would stand to reason that if this were indeed the case, that the straight portions of the walls had no trees existing or proposed in proximity. These straight sections of river wall constitute the bulk of the tree removal areas, including heritage specimens, and it could be concluded that these trees to be removed were planted sometime after construction of the river walls, possibly by man but more plausibly by nature.

In some cases, the structural infrastructure that is being proposed to prevent future failures and disrepair of these cultural resources cannot physically be constructed without the removal of adjacent trees. In other cases, some trees are negatively impacting the cultural resource and if allowed to continue to grow, would eventually severely damage or destroy said resource. In both cases, it's important to the rehabilitation and the sustainability of the park's cultural resources to remove those trees.

Some design alternatives were considered to attempt to lessen the impact to the trees that were directly adjacent to the cultural resources. However, it was concluded that there was no alternative design that would accomplish this adequately, as their implementation would each require heavy equipment, major excavation, and major infrastructure to adequately rebuild and rehabilitate the cultural resources. As such, the design chosen was based on other factors such as cost and ease of construction.

In addition, it was considered by the design and owner teams to change the design of the walls and build them so that their footprint was further away from some of the trees in question, thus providing space enough to not have to remove trees. However, the Texas Historical Commission (THC) and the Office of Historic Preservation (OHP) have both weighed in on the importance of reconstructing and repairing all the cultural resources to their original condition and **in their original location and configuration to preserve the historical significance of each cultural resource**. For instance, in the case of the Lambert Beach river walls and the Upper Labor Acequia walls, we would not be allowed to move walls forward or backward or adjust any configurations (i.e., lines, curves, angles, etc.) to avoid, or otherwise distance the walls from, any of the existing trees.

Because of this requirement for the preservation of the historically significant cultural resources by the THC, our only option for addressing these multiple sections of river walls and Acequia walls would be to remove those trees that would otherwise not allow us to reconstruct and/or repair the walls in proper fashion and in the manner consistent with the THC's requirements for the project.

Not addressing these resources at all, specifically where trees are directly adjacent, would allow the degradation and structural failure of those cultural resources to continue, exacerbating the current problem and posing a threat to the health, safety, and welfare of the public. In addition, allowing walls to fail where they are retaining the adjacent trees and their root systems would also eventually cause those trees to fail as well.

In conclusion, to adequately rehabilitate and repair all the cultural resources within our capital project's scope of work as proposed, and in accordance with the THC and the OHP, several trees must be removed from the project site equating to less than 80% preservation for significant trees and less than 100% preservation for Heritage trees.

## **Preservation Calculations**

	Floodplain		Floodplain Buffer (ESA)		Upland		Totals
	Significant	Heritage	Significant	Heritage	Significant	Heritage	
Total caliper inches	2128	1083	124	136	195	135	3801
Total inches preserved	969.5	779	86	111	178	135	2258.5
Total inches removed	1158.5	304	38	25	17	0	1542.5
Total mitigation	733	912	13	75	-100	0	1633

### **Mitigation:**

Total proposed inches to be planted during construction phase of the capital improvement project – 792"

Total number of trees to be planted during construction phase of the capital improvement project – 220

Remaining mitigation balance to be planted elsewhere within Brackenridge Park – 841"

The construction project that rebuilds and rehabilitates the park's cultural resources and plants a portion of the mitigation trees will most likely start construction in early 2023 and be complete sometime in the Spring or Summer of 2024. It's likely that these 220 trees will be planted in spring 2024 to coincide with the latter stages of construction.

As for the balance to be planted elsewhere within Brackenridge Park but outside of the capital project, the most opportune areas to plant would be the St. Mary's Street corridor within the park boundary, the wilderness area along Avenue B, and the San Antonio River corridor south of Tuleta Dr. Another possible area for a smaller grouping of tree plantings would be the Brackenridge Park main entrance off Broadway, across from Mahncke park. The current plan is to initiate these plantings throughout fall of 2023 and winter/spring of 2024 as a supplemental and concurrent phase of the capital improvement project.

Should you have any questions or require any additional information, please reach out to my office to discuss via email at [jamaal.moreno@sanantonio.gov](mailto:jamaal.moreno@sanantonio.gov) or via phone at 210-207-6924.

Respectfully,



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