

# Ord. 25-S-047

Proposed Zone Change to R-2 for 32 acres APZ II

**Daisy Marquez | Senior Planner**



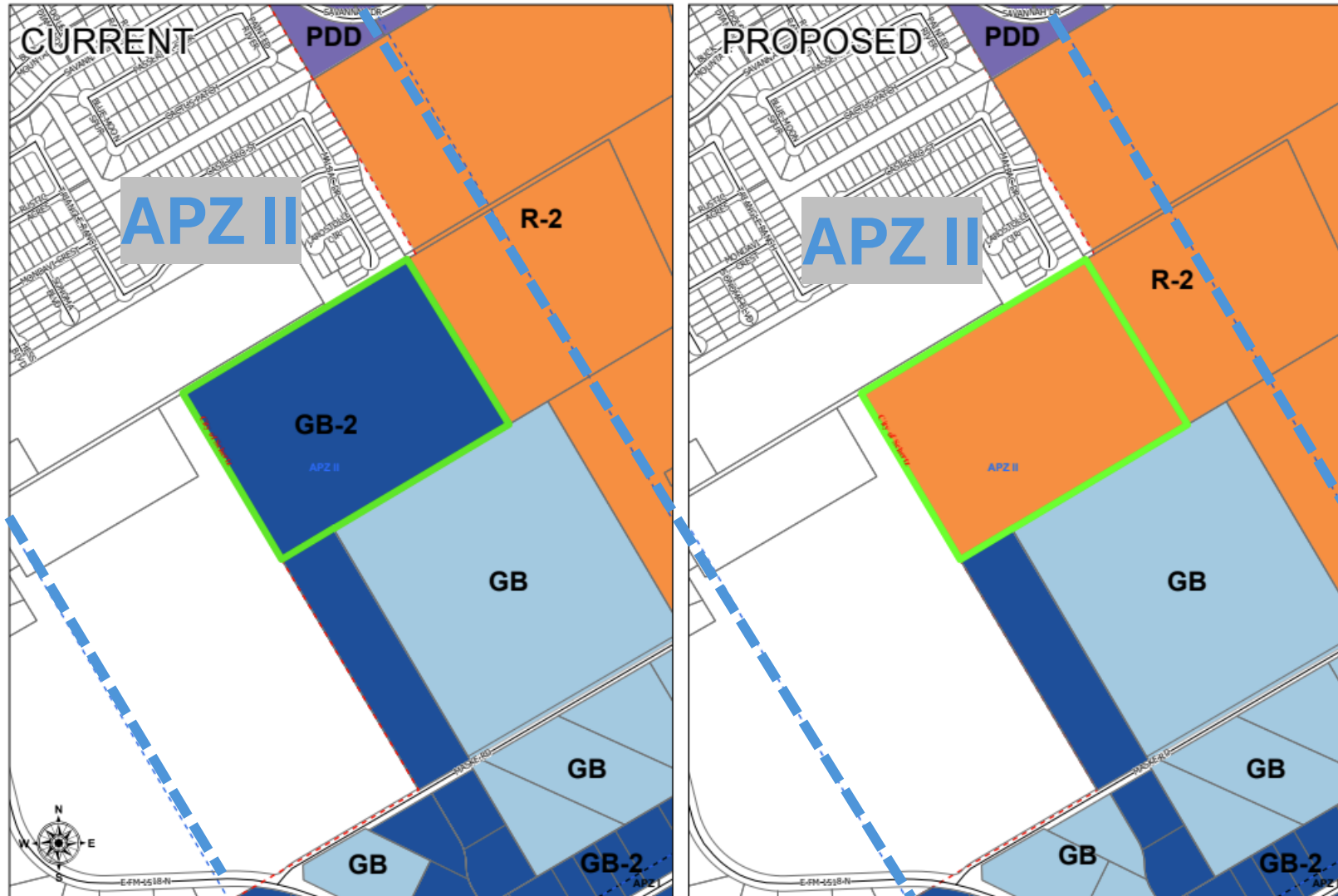
	Zoning	Use
Subject Property	General Business District-II (GB-2)	Undeveloped
North	Out of City Limits	Universal City Agriculture/ Homes
South	General Business District-2 (GB-2) and General Business District (GB)	Soccer Fields Private and Soccer Fields owned by City of Schertz
East	Single-Family Residential District (R-2)	Undeveloped
West	Out of City Limits	Universal City ETJ Undeveloped/ Agriculture



- 10 Public notices were sent on 06.18.2025
- As of today
  - (3) in Favor
  - (0) Neutral to
  - (3) in Opposition
- A public hearing notice was published in the “San Antonio Express” 10.29.25
- (2) Notification Signs were placed by the applicant
- Notice was sent to SCUC ISD



# Background:

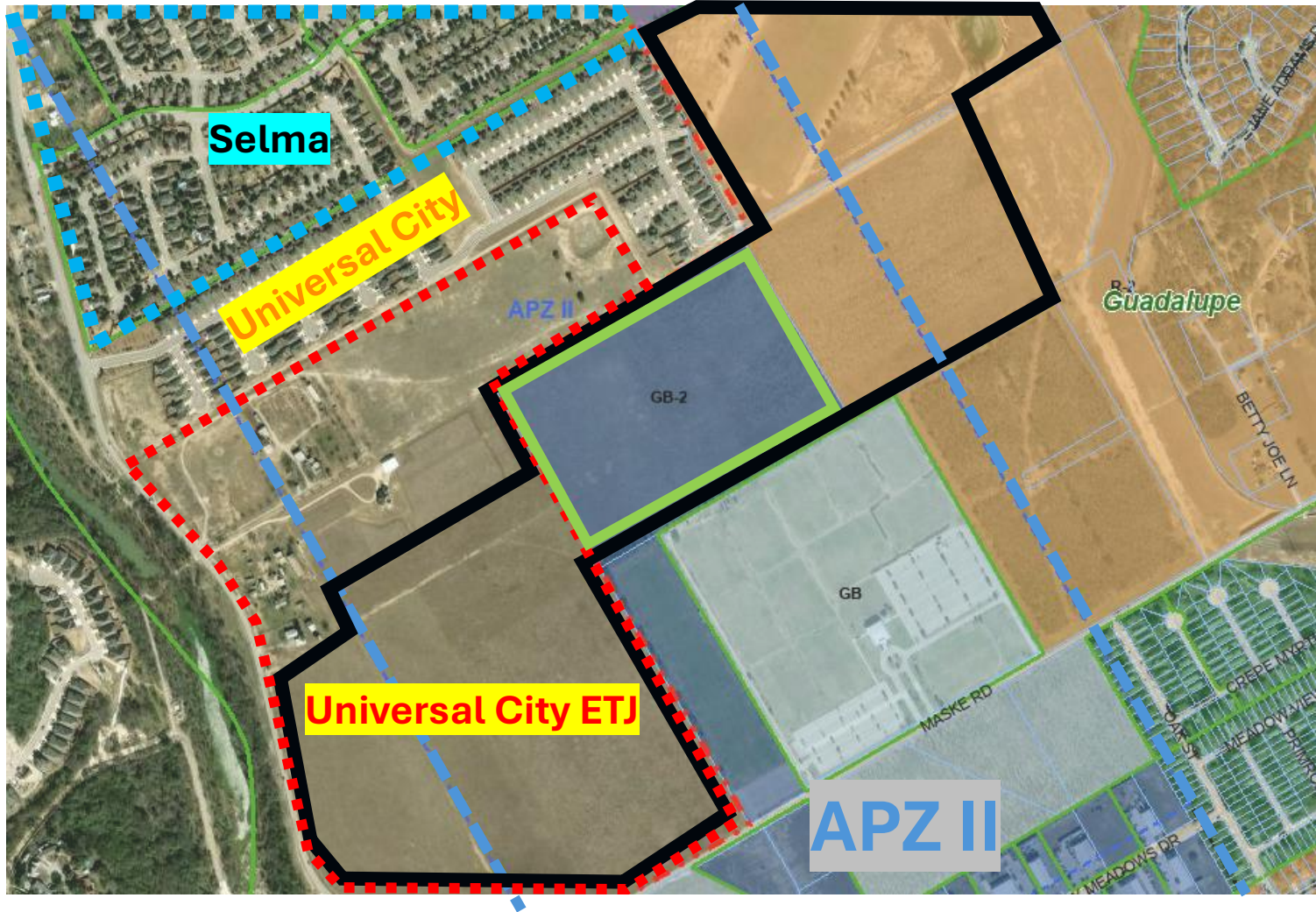


- 32 Acres
- In the APZ II
- Requires Affirmative Recommendation from JBSA

# Zoning District Requirements

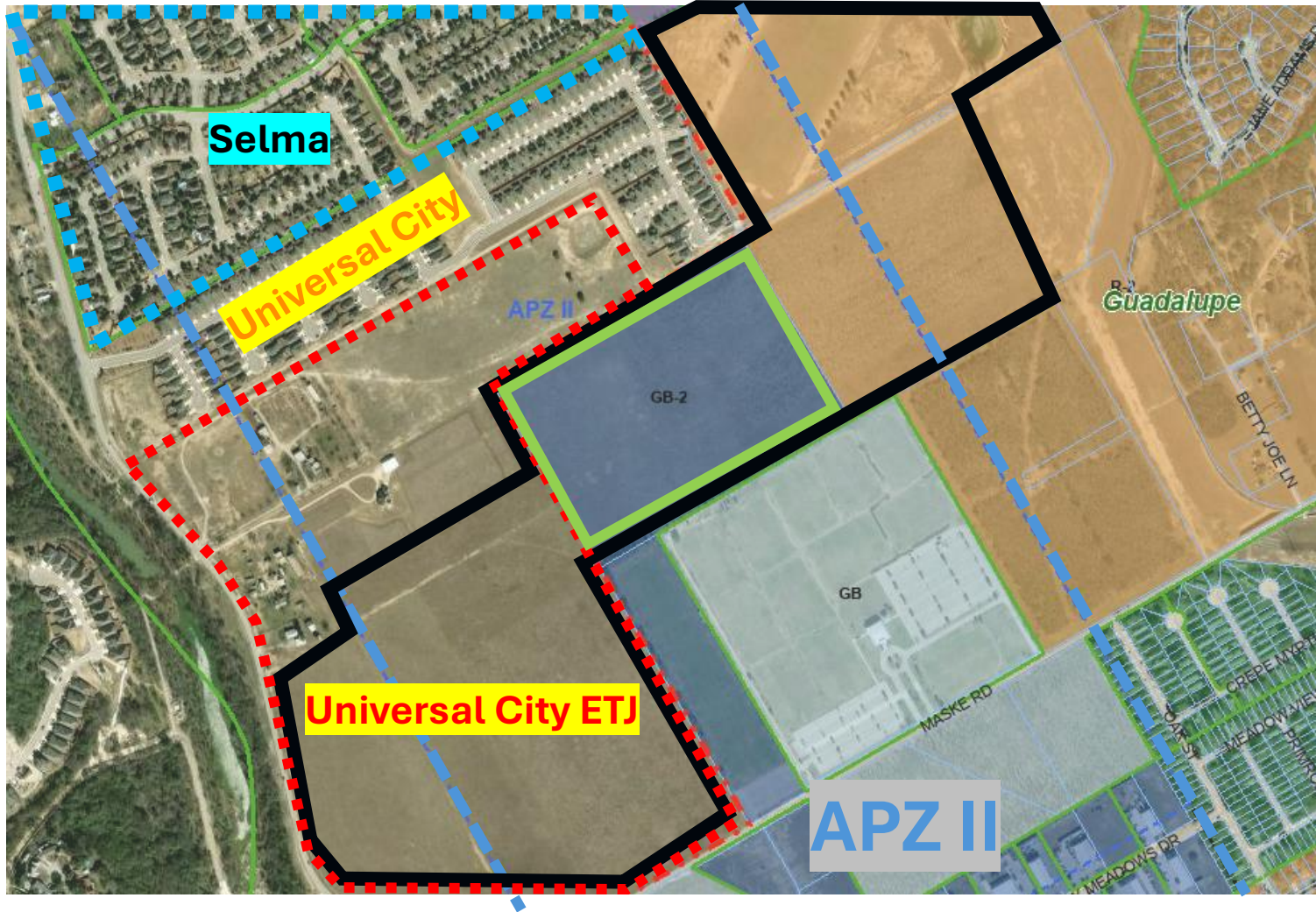
	Existing	Proposed
	General Business District-II (GB-2)	Single-Family Residential District (R-2)
Permitted Uses (Sec. 21.5.8)	<ul style="list-style-type: none"> <li>• Appliances, Furniture and Home Furnishing Store                             <ul style="list-style-type: none"> <li>• Building Material and Hardware Sales                                     <ul style="list-style-type: none"> <li>• Car Wash, Automated</li> </ul> </li> <li>• Commercial Amusement, Indoor</li> <li>• Auto Repairs and Service, Major</li> </ul> </li> <li>• <b>Office Warehouse/Distribution Center</b></li> <li>• Mini-Warehouse/Public Storage (SUP)                             <ul style="list-style-type: none"> <li>• <b>*non-exhaustive list</b></li> </ul> </li> </ul>	<p>Family or group home Gated Community Golf Course <b>* Non-exhaustive list</b></p>
Area Square Feet (Sec. 21.5.7)	10,000	8,400
Width & Depth (Sec. 21.5.7)	100 x 100	70 X 120
Setbacks, Adj. Non-Residential (Sec. 21.5.7)	Front: 20', Side: NA, Rear: NA	Front :25; Side: 10; Rear: 20
Maximum Height (Sec. 21.5.7)	120'	35'
Maximum Impervious Coverage (Sec. 21.5.7)	80%	50%

# Background:



- Per the Letter of Intent:
  - Part of a larger multiple jurisdiction development
- Subject Property = 32 acres

# Background:



- City of Schertz only has jurisdiction for properties within its city limits.
  - UDC includes adopted rules and regulations for properties in the AICUZ
- Other jurisdictions may not utilize the same rules and regulations within the AICUZ in the same fashion Schertz does.

# APZ Approval Requirement

## Sec. 21.5.9. - Special districts.



### A. *Air Installation Compatible Use Zone District (AICUZ).*

1. Established to provide control on encroachment around a military airfield, encroachment that could destroy the harmonious relationship existing between the local community and a military airfield. This could eventually lead to the removal of the airfield, which would affect the economy of the area. Restrictions established in accordance with suggested guidelines and studies published by the military will control the development, construction and density of the area. The area is subject to high frequency of noise from aircraft and is at high risk to potential aircraft accidents. All uses and regulations contained within the AICUZ shall be in accordance with the AICUZ study and regulations published by Randolph Air Force Base.
2. A request for development that is not a permitted use by the AICUZ Study, as adopted by the City, or a request for zoning change for property located within the AICUZ requires written notification to Randolph Air Force Base (RAFB) of the proposed development, type occupancy, occupant load, hours of operation, and any special conditions of the project that may include noise, dust, smoke emissions, etc., and any proposed request for a zone change within the AICUZ, with applicable reference the Standard Land Use Code Manual (SLUCM) as adopted in the AICUZ Study. An acknowledgment from RAFB will be requested on the proposed development within 60 days. RAFB may conclude that the proposed development or zoning change should be permitted. **Unless RAFB affirmatively recommends to the City that the proposed development or zoning change in the AICUZ be permitted, the development or zoning change will not be approved by the City.** Failure on the part of RAFB to respond within 60 days will be deemed to be disapproval.



DEPARTMENT OF THE AIR FORCE  
502D AIR BASE WING  
JOINTBASE SAN ANTONIO



## APRIL LETTER

9 April 2025

MEMORANDUM FOR CITY OF SCHERTZ

FROM: 502 ABW/CMI  
JBSA Installation Mission Sustainment  
2080 Wilson Way  
Fort Sam Houston, TX 78234

SUBJECT: Joint Base San Antonio review of Zoning Case PLZC20250062 Proposed Rezone to R-2 in APZ II

1. PLZC20250062 Proposed Rezone to R-2 in APZ II has been reviewed by JBSA-RND organizations. JBSA recommends addressing the following comments before moving forward in the planning and development process.

- a. Proposed City of Schertz R2 Zoning Category would permit minimum 8,400 sq ft (70'x120') lots within APZ II. At 25-acres, the proposed zoning category of R2 could permit up to 129 lots. The proposed exhibit displays 77 units within the subject 25-acre portion of the proposed MDP, bringing the proposed density to 3.08 du/acre. This exceeds the recommended compatible maximum density of 2 du/acre within APZ II per the 2017 RND AFB AICUZ Land Use Compatibility Tables, SLUCM no. 11, Residential, Single units: detached. Request clarification from applicant on total proposed units within 25-acre portion of APZ II.



DEPARTMENT OF THE AIR FORCE  
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## MAY LETTER

22 May 2025

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JBSA Installation Mission Sustainment  
2080 Wilson Way  
Fort Sam Houston, TX 78234

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1. PLZC20250062- Proposed Rezone to R-2 in APZ II-Updated Application has been reviewed by JBSA-RND organizations. JBSA recommends addressing the following comments for consideration in the planning and development process.

- a. Approximately 32-acres of the subject tract are located w/in JBSA RND runway 15L/33R Accident Potential Zone II (APZ II). Per the 2017 RND AFB Air Installation Compatible Use Zones (AICUZ) study, maximum recommended density for single-family land uses w/in APZII is not to exceed 2 dwelling units/acre. JBSA recommends application of the above 2 dwelling units/acre single-family land use maximum density as applied to the subject 32-acre parcel, through the establishment of the appropriate, flexible, City of Schertz Zoning District as identified within Article 5, Sec. 21.5.9. – Special Districts, of The City of Schertz Unified Development Code.

## An Example Not Received By This APPLICATION



DEPARTMENT OF THE AIR FORCE  
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12 May 2025

MEMORANDUM FOR CITY OF SCHERTZ

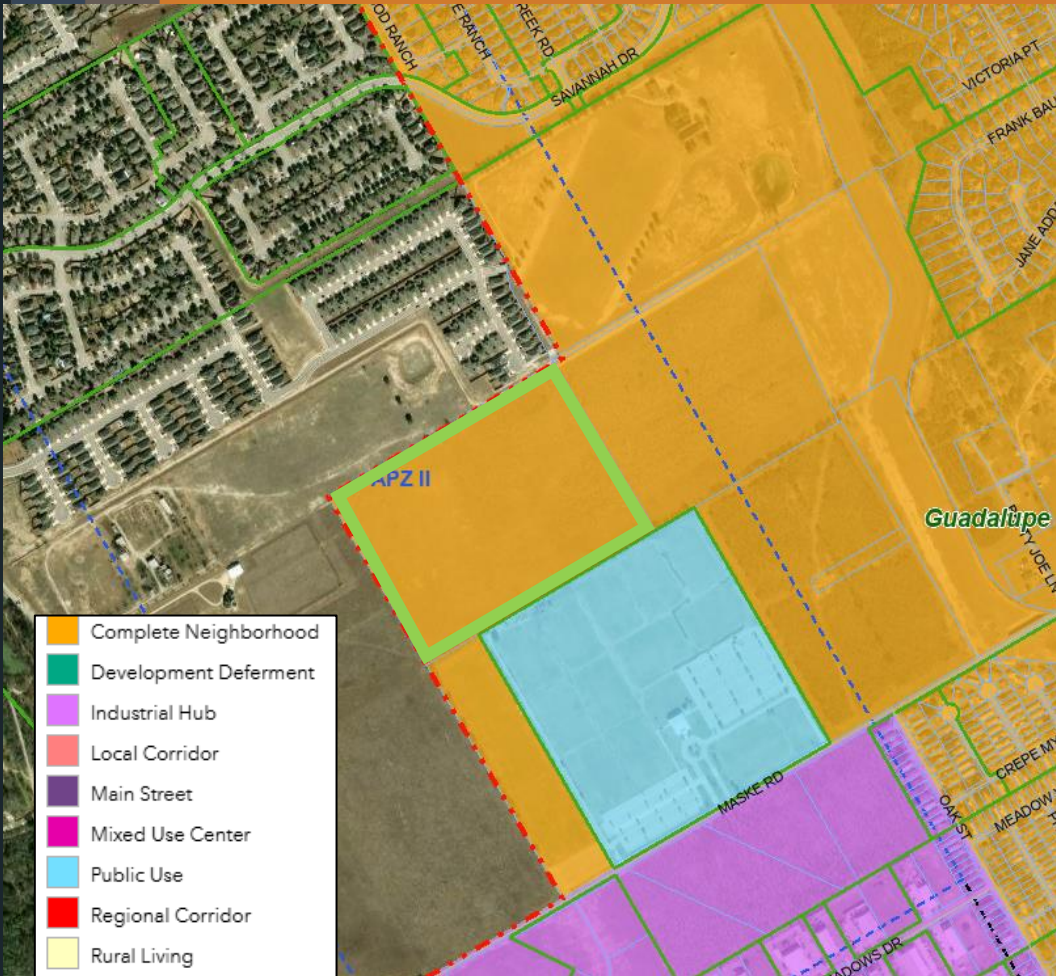
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SUBJECT: Joint Base San Antonio review of Zone Change in APZ II PLZC20250094-Maske Road Business Park (36 & 40 Maske Road)

1. Zone Change in APZ II PLZC20250094-Maske Road Business Park (36 & 40 Maske Road) has been reviewed by JBSA-RND organizations. JBSA affirmatively recommends the proposed zoning change is permitted, however, there are additional comments for consideration in planning and development.

# UDC SECTION 21.5.4.D Criteria for Approval

1. Whether the proposed zoning change implements the policies of the adopted Comprehensive Land Plan, or any other applicable adopted plans.



- Complete Neighborhood: Mixture of Housing and supporting land uses
- Consider: Conflicts among land uses & roadway classification
- All 32 acres are within the APZ II
  - Proposed R-2 would allow 5.2 dwelling units/ acre
  - We cannot restrict the use of a property with straight zoning

**Considering the proposed residential density in the APZ-II that encumbers the property, the proposed residential is not appropriate at the specified location and creates conflicts among land use.**

- Does not implement the Comprehensive Plan.

# UDC SECTION 21.5.4.D Criteria for Approval

## 2. Whether the proposed zoning change promotes the health, safety, and general welfare of the City.

Does not promote the health, safety, and general welfare of the City.

- Applicant did not receive an affirmative recommendation from JBSA as required per UDC Section 21.5.9.A.2.

- Does not meet the UDC requirements.

### Sec. 21.5.9. - Special districts.

#### A. Air Installation Compatible Use Zone District (AICUZ).

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# UDC SECTION 21.5.4.D Criteria for Approval

The application was forwarded twice to JBSA for their review. Two letters were received in April and in May.

- No affirmative recommendation was received.



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# UDC SECTION 21.5.4.D Criteria for Approval

of an affirmative recommendation letter from another application.

## An Example Not Received By This APPLICATION



DEPARTMENT OF THE AIR FORCE  
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1. Zone Change in APZ II PLZC20250094-Maske Road Business Park (36 & 40 Maske Road) has been reviewed by JBSA-RND organizations. **JBSA affirmatively recommends the proposed zoning change is permitted**, however, there are additional comments for consideration in planning and development.

- a. Subject parcel is located within Randolph AFB Accident Potential Zone II (APZ II). Per the 2017 RND Air Installations Compatible Use Zones (AICUZ) study, Warehousing and storage services, SLUCM No. 63.7, is permitted within APZ II with a maximum Floor-to-Area Ratio (FAR) of 2.0. Retail trade, SLUCM No. 50, is generally permitted within APZ II with a maximum FAR of .28. The majority of Office services, to include Misc Services (SLUCM no. 69) are permitted w/in APZ II with maximum FAR of .22. Additionally, due to the proximity to the primary approach/departure flight tracks of RND AFB, expect regular and increasing levels of noise.

# UDC SECTION 21.5.4.D Criteria for Approval

## 2. Whether the proposed zoning change promotes the health, safety, and general welfare of the City.

- Does not meet the **UDC requirements** of UDC Section 21.5.9
- Did not receive JBSA affirmative recommendation as required per UDC Section 21.5.9.
- Comprehensive Plan:
  - Collaboration with Stakeholders
  - UDC has procedures in place to ensure collaboration with JBSA per UDC Section 21.5.9

### Sec. 21.5.9. - Special districts.

#### A. *Air Installation Compatible Use Zone District (AICUZ).*

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# UDC SECTION 21.5.4.D Criteria for Approval

## 3. Whether the uses permitted by the proposed change will be consistent and appropriate with existing uses in the immediate area;

- Single-Family Residential District (R-2)
  - Schools, Parks, Single-Family
- Airport Installation Compatible Use Zone District (AICUZ)
  - APZ II
  - Single-Family residential is not incompatible within the AICUZ however, the density proposed with R-2 zoning is not compatible
- TIA Determination Form
  - The request in zone change from GB-2 to R-2 would not have an adverse impact to the transportation system created by the proposed development traffic

# UDC SECTION 21.5.4.D Criteria for Approval

## 4. Whether other factors are deemed relevant and important in the consideration of the amendment.

- Proposed zone change does not meet the Unified Development Code Requirements as listed in Section 21.5.9.A.2.
  - No Affirmative Recommendation from JBSA received
- Police, Fire, And EMS Departments were notified
  - Police and EMS do not have specific concerns over the zone change request
  - The Fire Department has concerns with potential residential development within the JBSA Flight Path due to the additional potential of accidents in the APZ

2. A request for development that is not a permitted use by the AICUZ Study, as adopted by the City, or a request for zoning change for property located within the AICUZ requires written notification to Randolph Air Force Base (RAFB) of the proposed development, type occupancy, occupant load, hours of operation, and any special conditions of the project that may include noise, dust, smoke emissions, etc., and any proposed request for a zone change within the AICUZ, with applicable reference the Standard Land Use Code Manual (SLUCM) as adopted in the AICUZ Study. An acknowledgment from RAFB will be requested on the proposed development within 60 days. RAFB may conclude that the proposed development or zoning change should be permitted. Unless RAFB affirmatively recommends to the City that the proposed development or zoning change in the AICUZ be permitted, the development or zoning change will not be approved by the City. Failure on the part of RAFB to respond within 60 days will be deemed to be disapproval.

***Staff Recommendation:***

UDC Section 21.5.9.A.2. stipulates that unless Randolph Air Force Base (RAFB) affirmatively recommends to the City that the proposed development or zoning change in the Air Installation Compatible Use Zones (AICUZ) be permitted, the development or zoning change will not be approved by the City.

**Staff recommends denial of Ord.25-S-047 for not meeting the Unified Development Code requirements, as the applicant has failed to obtain an affirmative recommendation from JBSA-Randolph as per UDC Section 21.5.9.A.2.**

***Planning and Zoning Commission Recommendation:***

The Planning and Zoning Commission held a public hearing for the item on October 1, 2025, and made a recommendation of denial to City Council with a 7-0 vote.