

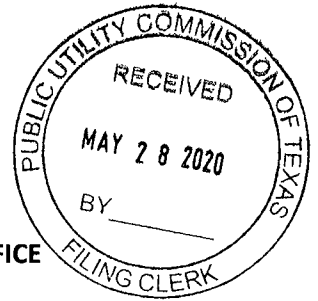


Control Number: 51023



Item Number: 869

Addendum StartPage: 0



SOAH DOCKET NO. 473-21-0247  
PUC DOCKET NO. 51023

APPLICATION OF THE CITY OF SAN ANTONIO ACTING BY AND THROUGH THE CITY PUBLIC SERVICE BOARD (CPS ENERGY) TO AMEND ITS CERTIFICATE OF CONVENIENCE AND NECESSITY FOR THE SCENIC LOOP 138-KV TRANSMISSION LINE IN BEXAR COUNTY

BEFORE THE STATE OFFICE

OF

ADMINISTRATIVE HEARINGS

**REPLY BRIEF OF YVETTE REYNA, PRO SE INTERVENOR RESIDING IN SERENE & SCENIC HILLS ESTATES**

TO THE HONORABLE ADMINISTRATIVE LAW JUDGES:

**I. INTRODUCTION**

As stated in my initial brief, I wholeheartedly believe the best substation choice is Substation Site 6 and the best Route choices are P, R1 and W.

**II. JURISDICTION AND NOTICE**

I am not in agreement with post-hearing initial briefs by Clearwater Ranch, Bexar Ranch, L.P. and Guajalote Ranch, Inc, and Save Huntress Lane Area Association.

**III. ISSUES**

**IN CLEARWATER RANCH'S POST-HEARING INITIAL BRIEF they stated:**

- SUMMARY OF THE ARGUMENT Clearwater Ranch is a large-acre neighborhood nestled in the Texas Hill County, where landowners enjoy the native wildlife and rural lifestyle.

**REBUTTAL:** I believe the attorneys for Clearwater Ranch are misrepresenting the size of the lots in Clearwater Ranch. An acre of land is equivalent to 43,560 square feet. The size of the acreage that is being sold in Clearwater Ranch is 11 acres, see the properties for sale below. I don't want this to be confused with the neighborhood I live in, Serene and Scenic Hills Estates. The majority of homes in our neighborhood are on right about an acre. There is a huge difference between an electrical pole placed 84 feet away from you, like my neighbor at 25060 Toutant Beauregard, in our neighborhood of established homes that sit side-by-side on 1 acre lots in Serene and Scenic Hills Estates and an electrical pole placed over 400,000 square feet away from you while living on an 11 acre plot of land in an area of

*Handwritten signature or initials*

many vacant lots in Clearwater Ranch. With the close proximity of established homes in Serene and Scenic Hills Estates, many more residents would undoubtedly be more exposed to electric and magnetic fields than residents that live on an 11-acre plot of land or that still have the choice on where they will place their future luxurious home on a vacant lot in Clearwater Ranch.

## LOT 10 CLEARWATER RUN | SAN ANTONIO, TX

**\$679,500**

**N/A**  
BED

**N/A**  
BATH

**N/A**  
SQFT

**11**  
ACRES

### DETAILS

STATUS: Active

YEAR BUILT:

TYPE: residential lot and acreage

PARKING:

TOTAL STORIES:

MLS: 1515984

COUNTY: Bexar

PRICE PER SQFT

### PROPERTY DESCRIPTION

In an area of amazing rolling Hill Country views close to shopping, dining and city amenities- this is a fabulous lot with useable 11 acres with ag-exemption and it backs to Leon Creek! Nicely treed property with incredible building sites in this gated neighborhood with luxurious homes, Several tracts are available if you are looking for more acreage.

## 18C HUNTRESS LANE | SAN ANTONIO, TX

**\$699,500**

**N/A**  
BED

**N/A**  
BATH

**N/A**  
SQFT

**11**  
ACRES

### DETAILS

STATUS: New

YEAR BUILT:

TYPE: residential lot and acreage

PARKING:

TOTAL STORIES:

MLS: 1508750

COUNTY: Bexar

PRICE PER SQFT

### PROPERTY DESCRIPTION

Remarkable view property in the private community of Clearwater Ranches! Close to shopping, dining and IH-10, this is an amazing opportunity to build your dream home on acreage in a high-end development near amenities. Easy to drive or walk to see this property- unique opportunity with purchase-seller to convey the adjoining lot in the Canyons at Scenic Loop at the same time. Allows you to do multi-generational living with more than one home or have a trophy home in the Canyons with plenty of room for animals and secondary homes in Clearwater Ranch. Buyer can also sell lot after purchase!

# 10811 CLEARWATER MEADOWS | SAN ANTONIO, TX

**\$699,500**

**N/A**  
BED

**N/A**  
BATH

**N/A**  
SQFT

**11**  
ACRES

## DETAILS

STATUS: Active

YEAR BUILT:

TYPE: residential lot and acreage

PARKING:

TOTAL STORIES:

MLS: 1508750

COUNTY: Bexar

PRICE PER SQFT

## PROPERTY DESCRIPTION

Remarkable view property in the private community of Clearwater Ranches! Close to shopping, dining and IH-10, this is an amazing opportunity to build your dream home on acreage in a high-end development near amenities. Easy to drive or walk to see this property- unique opportunity with purchase-seller to convey the adjoining lot in the Canyons at Scenic Loop at the same time. Allows you to do multi-generational living with more than one home or have a trophy home in the Canyons with plenty of room for animals and secondary homes in Clearwater Ranch. Buyer can also sell lot after purchase!

**KW** SAN ANTONIO  
KELLER WILLIAMS REALTY

[EXPLORE AREA MAP](#)

[BUY](#)

[SELL](#)

[RENT](#)

[AGENT](#)

[Home](#) | [Neighborhoods](#) | [Clearwater Ranch](#) | [lot 10 Clearwater Run](#)



**Aerial View of Lot 10 Clearwater Run**



Home | Neighborhoods | Clearwater Ranch | lot 10 Clearwater Run



## Aerial View of 18C Huntress Lane

Home | Neighborhoods | Clearwater Ranch | 18c Huntress Lane



# Aerial View of 10811 Clearwater Meadows

**W** SAN ANTONIO  
KELLER WILLIAMS REALTY

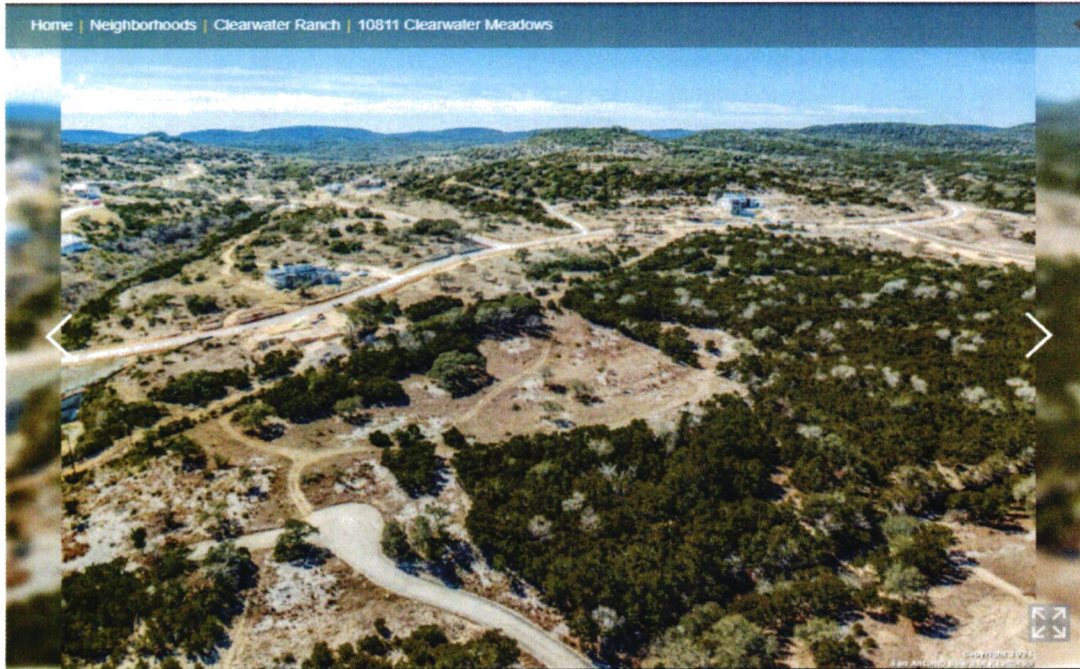
EXPLORE AREA MAP 

BUY

SELL

RENT

AGENT





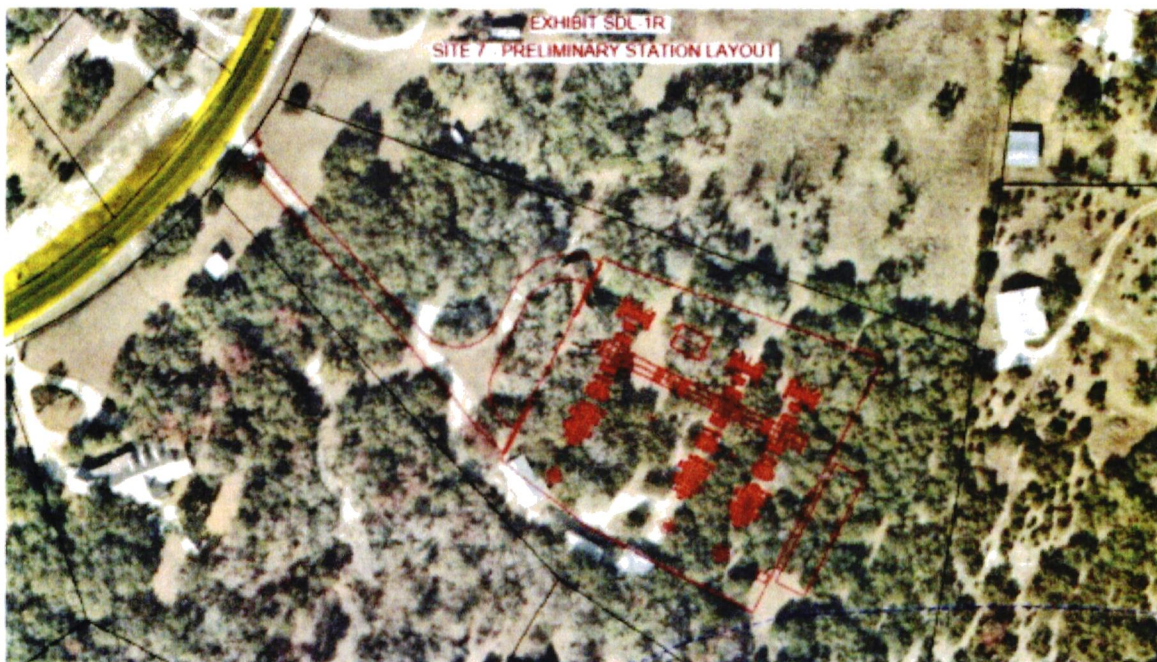
**IN BEXAR RANCH, L.P. AND GUAJALOTE RANCH, INC'S INITIAL BRIEF they stated:**

- IV. BEXAR RANCH. Bexar Ranch, which spans nearly 3,200 acres...
- While there is no singular reason to explain the Bitter Family's love for Bexar Ranch and their commitment to preserving it as they have, their goal is to continue to hold the property, which has been in their family for nearly 100 years and maintain it as a working ranch.
- Bexar Ranch is identified as the top property in San Antonio under consideration by APP (Aquifer Protection Program).
- There are no good choices on Bexar Ranch or on Guajalote Ranch.

**REBUTTAL #1:** While the Bitter Family has owned Bexar Ranch for nearly 100 years ago...the Aquifer Protection Program was established in 2000. If the family found value in preserving the environmental integrity of their large tract of unimproved land, they could have applied for a conservation easement 20 years ago and protected their property and the Edwards Aquifer Recharge and Contributing Zone in perpetuity. According to the Special Projects Manager at the Edwards Aquifer Protection Program, it takes 1 year to 1.5 years to establish a conservation easement. In reference to "no good choices on Bexar Ranch or on Guajalote Ranch", it is, in fact a better choice from the perspective of prudent avoidance to focus on placing transmission lines on land in close proximity to fewer homes.

**IN BEXAR RANCH, L.P. AND GUAJALOTE RANCH, INC'S INITIAL BRIEF they stated:**

- Under A. Strengths of Route Z2, bullet point #4, Z2 utilizes Substation Site 7, which will allow for greater shielding of the substation from public roadways and is preferred by the members of SHLAA (Save Huntress Lane Area Association)...see the photo below, which is located on page 12 of their brief.





**REBUTTAL #2:** Bexar Ranch pointed out that Substation Site 7, allows for greater shielding of a substation from public roadways. Substation Site 7 on 25047 Toutant Beauregard) is tucked back amongst numerous trees, if the Public Utility Commission chooses it as the Substation Site, it would place habitable structures, wildlife, and surrounding trees in grave danger if a fire occurred. Placing a substation in a space surrounded on all 4 sides by trees (see photo below) is absolutely terrifying, trees are like matchsticks to a flame that can quickly start a wildfire.



Substation fires are not uncommon in North America. By doing a hazard mitigation analysis it is easy to see, that placing Substation Site 7 far back in the middle of trees, is *setting the stage for failure in our Texas Hil Country community.*

**Here are a few of the reasons why:**

- ❖ From the public roadway along Toutant Beauregard, a fire hydrant along the utility easement would be at the greatest distance from the location of the placement of Substation Site 7. And when a substation fire occurs on average it takes 500 gallons of water to put out a major substation fire, which would greatly impact the viable water source for neighbors living along Toutant Beauregard and within Serene and Scenic Hills Estates subdivision.
- ❖ The closest fire department to Substation Site 7 is the Leon Springs Volunteer Fire Department ESD #4 built in 2010 at 28036 Boerne Stage Road. These volunteer firefighters are unpaid.





- ❖ Leon Springs Volunteer Fire Department ESD #4 (see photo above) at 28036 Boerne Stage Road is 3.3 miles away from Substation Site 7 located at 25047 Toutant Beauregard.
- ❖ The next closest fire department to Substation Site 7 is Bexar County Fire Department No. 8 – Fire Station 182, built in 2020.



- ❖ Bexar County Fire Department No. 8 – Fire Station 182 it is located at 20825 Babcock Road it is 4.7 miles from Substation Site 7 located at 25047 Toutant Beauregard.
- ❖ When a fire occurs at a substation it is like an octopus with tentacles. The fire typically starts where the main transformer is located (the body of the octopus) and the fire can spread with 5000 degree arching flames to the other components (the tentacles) on the substation site. And those flames can easily travel to the top of the treelines surrounding the substation site, especially if the substation is surrounded by trees on all 4 sides. The fire moves across other trees, down trunks and downwards to the brush below to start a wildfire. A combination of foam and water would need to be used to suppress a fire at a substation. The application of both foam and water would contaminate and pollute the natural area surrounding Substation Site 7.

- ❖ **When it comes to fire safety, every second counts.**
- ❖ So in contrast with the proximity of the fire stations to Substation Site 7...Substation Site 6 will not be surrounded by trees on 4 sides, therefore it would be well-appointed as the most desirable substation site location.
- ❖ The Substation Site 6 location has *not yet been assigned an address*, it sits along Scenic Loop Road, as seen in the images below, the site is highlighted in light blue #251046...

**Property**

**Account**

Property ID: 251046  
 Geographic ID: 04703-300-0010  
 Type: Real  
 Property Use Code: 001  
 Property Use Description: Single Family

**Protest**

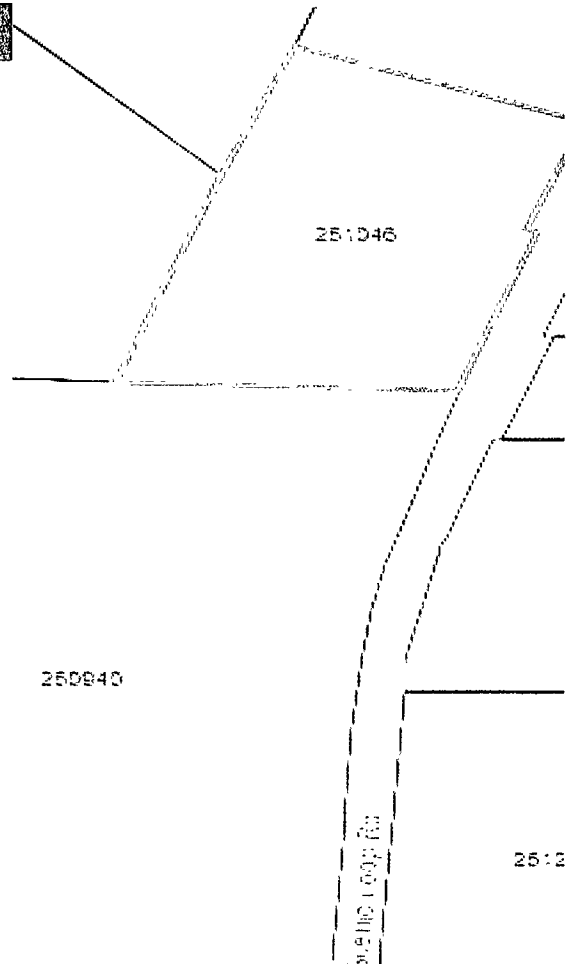
Protest Status: OP(OPEN PROTEST)  
 Informal Date:  
 Formal Date:

**Location**

Address: SCENIC LOOP RD  
 SAN ANTONIO, TX 78255  
 Neighborhood: WESTBROOK I,II,III(NS)  
 Neighborhood CD: 99514

**Owner**

Name: ARROYO FRANCISCO J & BARBARA M



- ❖ Substation Site 6, sits right beside a vacant lot at 24209 Scenic Loop Road (in the image above it is #250940 on the Bexar Appraisal District Website), so for the sake of mapping out distance, from nearby fire stations to Substation Site 6 (which has not been assigned an address yet), I will use the 24209 Scenic Loop Road address beside Substation Site 6.
- ❖ The closest fire department to Substation Site 6 (using address 24209 Scenic Loop Road) is the newly built Bexar County Fire Department No. 8 – Fire Station 182 it is located on 20825 Babcock Road and it is 3.0 miles from Substation Site 6 (using address 24209 Scenic Loop Road).
- ❖ The next closest fire department to Substation Site 6 (using address 24209 Scenic Loop Road) is Leon Springs Volunteer Fire Department ESD #4 at 28036 Boerne Stage Road it is 3.7 miles away from Substation Site 6 (using address 24209 Scenic Loop Road). And it is exactly the same distance to another fire department, that provides reciprocal support to area fire departments: Grey Forest Area Volunteer Fire Department, these volunteer firefighters are paid. Grey Forest Area Fire Department is located at 18515 Scenic Loop Road which is 3.7 miles away from



Substation Site 6 (using address 24209 Scenic Loop Road). Grey Forest Area Volunteer Fire Department at 18515 Scenic Loop Road would be 5.4 miles away from Substation Site 7 at 25047 Toutant Beauregard.

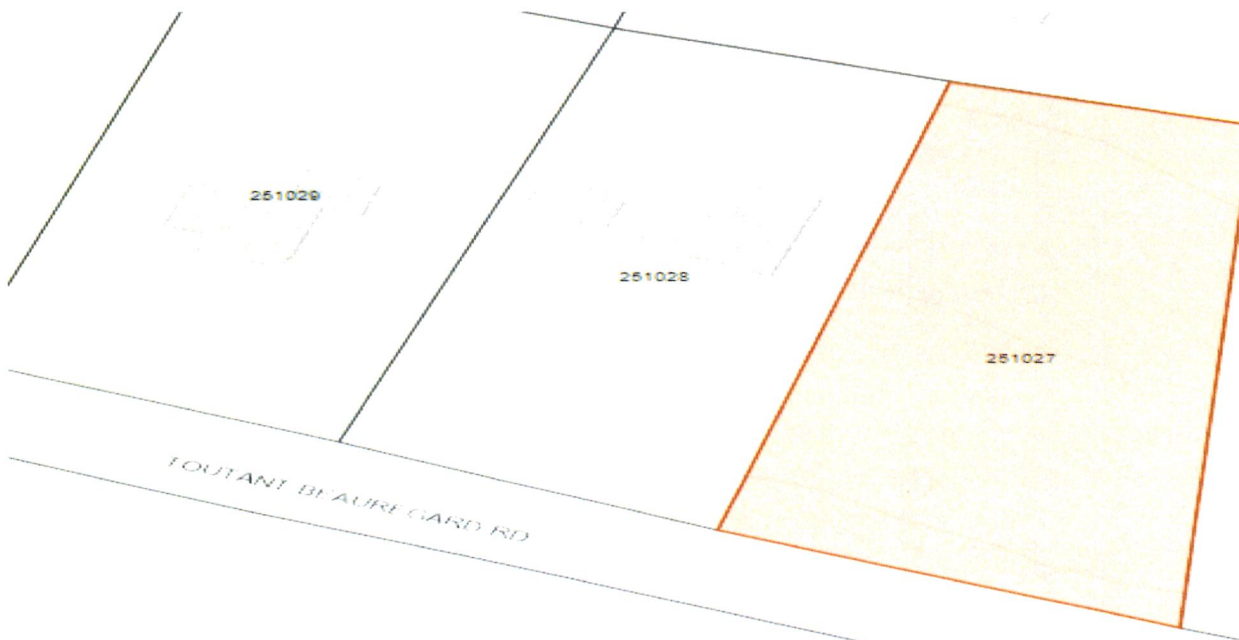
- ❖ A fire hydrant would be able to be placed in very close proximity to Substation Site 6, which is in stark contrast to where it would be placed along the easement by Substation Site 7.
- ❖ When every second counts, it is justifiable that Substation Site 6 is the absolute best location for the placement of a substation, as it has very close proximity to a fire hydrant and 2 fire stations: Bexar County Fire Department No. 8 and Grey Forest Area Volunteer Fire Department, both with paid firefighters.

**IN SAVE HUNTRESS LANE AREA ASSOCIATION INITIAL BRIEF they stated:**

- Mr. Steven Herrera (as to Segment 54, who, in the entire Scenic Hills subdivision, is the only one with property bordering Toutant Beauregard Road that intervened in this case, as opposed to those interior to that subdivision who seemed more concerned about Segment 17, a segment which is not a part of any of the routes using Toutant Beauregard Road).

**REBUTTAL:** Mr. Steven Herrera is not the only intervenor, in the entire Scenic Hills subdivision, with property bordering Toutant Beauregard Road that intervened in this case. Here is a list of the additional individuals living along Toutant Beauregard in Scenic Hills subdivision that filed as intervenors:

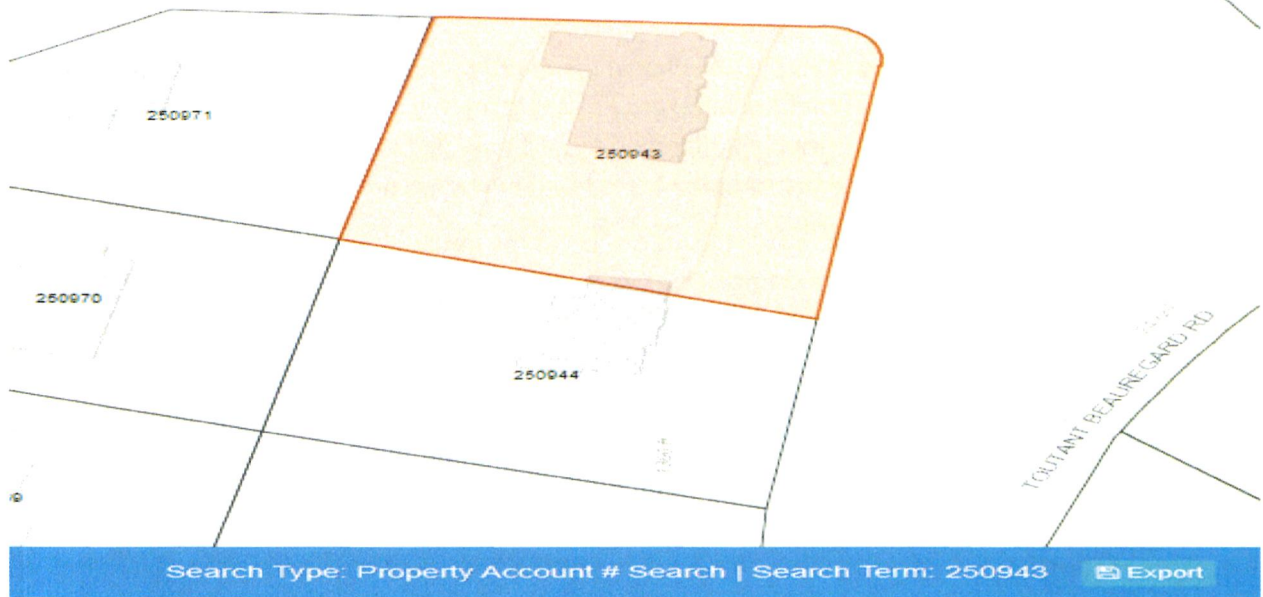
- **Filing 213 – Jesus Espinoza**      **25140 Toutant Beauregard** (see location below)
- **Filing 340 – Charlie Zimmer**      **9730 Serene Hills** (Mr. Zimmer’s mailbox is located on Serene Hills his home is located along Toutant Beauregard – see location of home on image below)



Search Type: Property Account # Search | Search Term: 251027

Owner ID	Owner Name	Legal Description	Situs Address
500236	ESPINOZA JESUS R	CB 4703 BLK 4 LOT 4	25140 TOUTANT BEAUREGARD RD SAN ANTONIO, TX 78255





Owner Name	Legal Description	Situs Address	Doing Business
ZIMMER CHARLIE &	CB 4703B BLK 1 LOT 1	9730 SERENE HLS SAN ANTONIO, TX 78255	Null

### CONCLUSION AND PRAYER

I, Yvette Reyna, I am a wife, I am a mother, I am part of the middle class, I am a neighbor to residents in our community Serene and Scenic Hills Estates. I believe Substation 6, P, R1 and W are the best choices for the Scenic Loop Substation and Transmission Line Project. Any routes utilizing segments 13, 14, 17 and 54, and substations 1 and 7 would be detrimental to humans and animals living in Serene and Scenic Hills Estates. Thank you for your time and thoughtful consideration.

*Respectfully submitted by,*  
Yvette Reyna, Intervenor Pre Se