



Zoning Staff Report

Date: June 24, 2025

Case Number: ZC-25-090

Council District: 10

Zoning Map Amendment

Case Manager: [Beth Knight](#)

Owner / Applicant: TOR Holdings, LLC/Tim Sansone **Acreage:** 7.787 acres

Site Location: 13001 Old Denton Road

Request

Proposed Use: Wood recycling and composting

Request: From: “K” Heavy Industrial in the Alliance Airport Overlay

To: Add Conditional Use Permit (CUP) to allow parking of wood recycling and composting, in “K” Heavy Industrial with development standard waivers for outdoor storage and fencing in front of the building, landscaping, screening; site plan included

Recommendation

Land Use Compatibility: Requested change **is not compatible**

Comprehensive Plan Map Consistency: Requested change **is consistent**

Comprehensive Plan Policy Consistency: Requested change **is not consistent**

Staff Recommendation: **Denial**

Zoning Commission Recommendation: **Denial with Prejudice by a vote of 7-0**

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Project Description and Background

The property is located less than 50 feet north of the intersection of Old Denton Road and Alliance Gateway Freeway (State Highway 170). The site was zoned “K” Heavy Industrial as part of its 2006 annexation into the City of Fort Worth. The site started being used for wood recycling and composting between April and December 2023, according to Google StreetViews. This land use begun without proper zoning approvals resulted Code Compliance violations in April 2025. Wood recycling is defined as wood debris brought to the site, sorted to remove contaminants, shredded or ground to create small pieces, then further ground into finer pieces to create wood mulch. Wood composting can be leafy material or wood mulch that is allowed to degrade into top soil amendments.

The site is a more intensive industrial use with outdoor wood processing and composting, than the surrounding less intensive uses including residential, commercial, warehousing, and vacant land. Single family houses with “D” zoning are located across SH 170, less than 700 feet to the southeast. South of the site, SH 170 (Alliance Gateway Freeway) is a 6-lane divided freeway with service road, which is suitable for semi-truck traffic. Old Denton Road is striped as a 2-lane undivided roadway, approximately 70 feet wide, but has paving approximately 40 feet wide. The roadway is listed on the Master Thoroughfare Plan as a Commercial Connector.

The applicants are requesting a Conditional Use Permit for wood recycling and composting be added to their “K” Heavy Industrial District, without a time limit for approval. Outdoor storage and bulk/retail sales of topsoil products are allowed by right in the industrial districts with a primary building; however, wood recycling and brush composting is only permitted with a CUP approval. The site began the Certificate of Occupancy permit for wood processing in August 2023 and revised their application to remove this use in September 2023. The applicant purchased the site in October 2023 and made the last revision to the CO in July 2024. The CO permit subsequently expired, but the applicant opened the business and is processing wood by chipping and composting. Wood chippers can produce noise up to 105 decibels, which is on par with a close jet fly-over, and 50 decibels more than the 65 decibel noise contour from the Alliance Airport Overlay. The sound at the closest residential use would be 65 decibels, which effectively extends the noise levels from the Alliance Airport Overlay past their intended limits.

Conditional uses are those uses which are generally compatible with the permitted land uses in a given zoning district, but which require individual review of their proposed location, design and configuration, and the imposition of conditions in order to ensure the appropriateness of the use at a particular location. While wood recycling and composting is not permitted in the “K” zoning district by right, allowing one by CUP with a site plan may help mitigate any neighborhood concerns, as well as give options for the CUP to be revoked in the event of new code violation convictions. Sec. 4.407 notes: The use of property for the purposes described in a conditional use permit shall not commence until a certificate of occupancy has been issued. A certificate of occupancy shall not be issued until all approvals which may be required by the codes and ordinances of the city, including, but not limited to, a building permit, a certificate of occupancy and subdivision approval have been satisfied.

The site plan shows outdoor storage areas on the eastern street frontage and western rear yard, with additional outdoor storage in concrete bins in the middle of the site. An office building and other building are also located in the site's center. The layout places the outdoor storage and fencing in front of the building, where non-habitable uses are required behind the building. The 300-foot front yard had the existing trees removed without an approved Urban Forestry permit and replaced with shredded wood piles. The site plan proposes to leave the prior front landscaping on Old Denton Road as outdoor storage only. No landscaping along the street would remain, with less than 2,000 square feet of open space remaining on the lot. The site is currently using 2 stacked shipping containers with a banner as their sign. As part of the CUP approval, this informal signage would be removed and replaced with a standard detached sign. A small waterway runs thru the rear storage yard.

The Fire Department has noted the buildings in the middle of the site cannot be reached from the existing fire hydrants. The site plan fails to show the storage of bagged materials in the northern fire lane, pallets by the northern storage building, and equipment to move the topsoil products. The site plan does not show where the combustible materials are generated or stored, compared to any non-combustible materials. Additionally, the site contains a large tank for refueling on-site equipment. Since wood mulching and composting, as well as fuel tanks, are known fire risks, additional mitigation measures are needed to ensure any fire is contained as much as possible. When winds are from the southwest, any smoke is likely to impact the multifamily complex approximately 500 feet to the northeast.

If a time limit is established for a Conditional Use Permit, the renewal of the CUP shall be considered through the public hearing process and approved by the City Council. A CUP shall expire if no permitting action is taken within six months of approval or the use ceases for six months. A CUP may be revoked through the public hearing process if necessary after convictions of one or more code violations.

Per Section 4.407 (a), the following general rules apply to all conditional uses:

- a) Conditional use permits in residential districts shall be limited to those uses designated "CUP" in the Residential District Use Table in Chapter 4, Article 6, Section 4.603.
- b) Approval of a conditional use permit shall authorize only the particular use or category of related uses for which the conditional use permit is issued.
- c) A conditional use shall not be enlarged, extended or otherwise modified unless approved by the City Council or approved administratively as applicable.
- d) The use of property for the purposes described in a conditional use permit shall not commence until a certificate of occupancy has been issued. A certificate of occupancy shall not be issued until all or approvals which may be required by the Codes and Ordinances of the City, including, but not limited to, a Building Permit, a Certificate of Occupancy and subdivision approval have been satisfied.

Section (d) provides the following Conditional Use Permit factors in consideration of appropriateness of a request:

- a) The proposed use is consistent with the Comprehensive Plan;
- b) The proposed use is compatible with the existing and adjacent uses.
- c) The proposed use meets all supplemental use standards specifically applicable to the use as set forth in Chapter 5;
- d) The proposed use is compatible with and preserves the character and integrity of adjacent development and neighborhoods;
- e) The proposed use is not materially detrimental to the public health, safety, and welfare, or results in material damage or prejudice to other property in the vicinity.

The following table provides information related to the proposed waivers of the standard ordinance requirements. The significant waivers on the site plan or due to existing site conditions are bolded.

Standard	K Zoning	Proposed CUP
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Non-habitable uses	Non-habitable uses behind building	Outdoor storage between the building and street
Front yard fencing	No fencing in front of the building	Fencing with ranch-style gates in front of the building
Landscaping	4% of site	0.005% of site
Fire lanes	Remain completely open	Materials stacked in fire lanes
Screening fence	Solid screening required	No screening shown
Signage	Detached monument sign allowed	Shipping containers and banner used as signage
Urban Forestry	Tree preservation/mitigation for eastern portion inside fence	No preservation/mitigation

Sec. 4.407 states: In approving the application, the zoning commission may recommend and the city council may impose such conditions as are reasonably necessary to mitigate adverse effects of the proposed use in accordance with these standards and the purpose and intent of this section. Conditions and modifications may include, but are not limited to:

- Regulation of period of time the use will be allowed;
- Limitation of building size or height;
- Increased open space;
- Limitations on impervious surfaces;
- Enhanced loading and parking requirements;
- Additional landscaping, curbing, sidewalk, vehicular access and parking improvements;
- Placement or orientation of buildings and entryways;
- Buffer yards, landscaping and screening;
- Signage restrictions and design;
- Maintenance of buildings and outdoor areas; and
- Development in accordance with a submitted site plan.

Surrounding Zoning and Land Uses

North “K” Heavy Industrial / autonomous truck testing, outdoor storage
East “C” Medium Density Multifamily, “G” Intensive Commercial / multifamily complex, convenience retail
South “D” Medium Density Multifamily, “G” Intensive Commercial / single family residential, vacant land
West “K” Heavy Industrial / gas well, warehouse

Zoning History

ZC-06-258, Council-initiated, from Unzoned to K, approved 12/12/2006.

ZC-14-036, Council-initiated, addition of Alliance Airport Overlay, approved, 4/10/2014.

Public Notification

300-foot Legal Notifications were mailed on May 30, 2025.

The following organizations were notified: (emailed May 30, 2025)

Organizations Notified	
Valley Ridge HOA*	Saratoga HOA

North Fort Worth Alliance	Keller ISD
Northwest ISD	Streams And Valleys Inc
Trinity Habitat for Humanity	

** Located closest to this registered Neighborhood Association*

Development Impact Analysis

Land Use Compatibility

The applicant is proposing to add a Conditional Use Permit without a time limitation to the site for wood recycling and composting; with notable waivers to storing materials in front of the building, minimal landscaping, no screening fence, and urban forestry. The intensive wood processing land use is not allowed by right in any industrial district. The waivers are needed because the applicant has begun operations without permits and converted the front landscaped area into wood mulch piles. The surrounding land uses are a mix of single family, multifamily, commercial, and industrial uses.

Additional City standards for a fire hydrant to reach the buildings in the middle of the site were also noted. If a fire starts due to the combustible wood mulch or compost, the emergency response would be hampered because a fire hose cannot reach the majority of the site from the closest hydrant. Additionally, no information is available as to whether or not machinery is available on-site to pull apart the mulch piles so firefighters can adequately gain access. The site also has bagged material stacked in fire lanes, creating issues for emergency responders. The surrounding uses are lower intensity, where this proposed zoning case with loud noises from the wood shredding would be better suited further away from residential uses.

The proposed zoning **is not compatible** with surrounding land uses, as the applicant has not demonstrated how the fire risks and enhanced safety standards would be handled, in addition to opening for business without obtaining the appropriate approvals or building permits. The business has not preserved the existing landscaped area or many of the trees. The zoning ordinance does not have any standards to mitigate the sound impacts on existing residential uses. The site plan or any other documentation fails to demonstrate how the wood recycling and composting would not be materially detrimental to the public health, safety, and welfare; or prejudicial to other properties in the vicinity.

Comprehensive Plan Consistency – Far North Sector

The 2023 Comprehensive Plan currently designates the subject property as “Industrial Growth Center” on the Future Land Use Map. The requested land uses are included in the description envisioned for this category, as detailed in the excerpt from the Comprehensive Plan below.

INDUSTRIAL

Industrial Growth Center

Industrial and commercial uses serving a large region

MU-2, All Commercial & Industrial

However, the proposed zoning is not consistent with the following policies of the Comprehensive Plan:

- Coordinate future land uses and development types and intensity with the Complete Streets policy, Master Thoroughfare Plan, Active Transportation Plan, and Transit-Oriented Development (TOD) Plans.

- Promote appropriate infill development of vacant lots, old commercial centers (greyfields), and contaminated sites (brownfields) within developed areas, particularly in the central city.
- Locate large industrial uses along freight rail lines, highways, or airports within industrial growth centers and other appropriate locations.
- Separate incompatible land uses with buffers or transitional uses. Some land uses have attributes such as height, proportion, scale, operational characteristics, traffic generated, or appearance that may not be compatible with the attributes of other uses.
- Do not locate residential uses or schools in areas adjacent to airfields having a noise level of 65 or more decibels DNL (average Day or Night Level).
- Maximize area of permeable surfaces in developments to reduce stormwater run-off.

The proposed zoning is **technically consistent with the future land use map**, but **inconsistent with the policies** stated above.

Site Plan Comments

Zoning and Land Use

The site plan as submitted is not in general compliance with the Zoning Ordinance regulations.

1. Include the site plan preparer's name, address, and telephone number.
2. Note the site's full list of uses and the current "K" Heavy Industrial zoning.
3. Insert the site's zoning case number of ZC-25-090 into the lower right corner box.
4. The lot's width dimensions needs to match the plat, instead of being noticeably different.
5. Outdoor storage, fences, and gates cannot be in front of the 2-story frame building. Staff supports only the fences and gates present when annexed, instead of the newly added outdoor storage.
6. Landscaping is required to be in front of the buildings. No landscaping has been provided. Document how the remaining trees and grassy area meet the site's required 4% landscaping.
7. Show and label where the tree mulching/chopping is done.
8. Show and label where the tree composting is done.
9. Show and label where the materials' bagging is done.
10. State the specific use and height of each building.
11. State the height of the concrete walls.
12. State the specific materials and maximum height of the bulk materials stored in the bins. It appears the bins frequently over-top the bin height, where materials can spill past this sides and rear of the bins.
13. Note whether these materials in the bins are combustible or non-combustible.
14. If the combustible materials are grouped together, delineate where these materials will be stored.
15. State the specific materials and maximum height of the bulk materials stored in the large open areas on the east and west ends. Stacked material cannot exceed the limits allowed by the Fire Department.
16. Note whether these materials in the large open areas are combustible or non-combustible.
17. The site photos show pallets stored adjacent to the northern buildings. Show and label where the pallet storage is located and note its height.
18. Add to the other notes at the bottom: "This site is in the Alliance Airport Overlay. Lighting fixtures shall be aimed straight down and shall meet IESNA full-cutoff criteria. Lighting shall not be aimed sky-ward. All over-night lighting shall be shielded. No lighting shall be installed more than 20-feet above grade."
19. Add to the other notes at the bottom: "This site is in the Alliance Airport Overlay. No emissions of smoke, ash, vapor, gas, dust, steam or other emissions that could obscure visibility of pilots or conflict with airport operations is allowed. No use shall foster an increase in bird population and thereby increase the likelihood of a bird impact problem."

20. The 2-story building appears to be 750 square feet/floor. State the total square footage instead.
21. Show the location of each building's entrances/exits, including over-head doors or open sides.
22. Update the distance between the southern building and the property line. The building appears to be much closer than 18.3 feet.
23. Label the distance between the southeastern bins and the southern property line.
24. The site is noted for both bulk and retail sales. Show where these uses are done, including loading areas for both semi/commercial trucks and passenger vehicles.
25. Dimension the width of the southern driveway and fire lane.
26. Note whether the southern driveway will be used or closed.
27. Note the gate structures' height and width.
28. Note 0 parking spaces are required, as the site is more than 250 feet from residential zoning or uses.
29. One handicap parking space is required for the amount of parking provided. Show and label this handicap space.
30. Any trees removed will require mitigation.
31. Show the existing trees' locations.
32. No dumpster screening is shown on the site plan. Show and label the dumpster's screening materials and height.
33. Solid screening fence is required around the outdoor storage areas to be wood, brick, stucco, or masonry products. Show the screening fence location and note its height and materials.
34. Note the site has no platted easements.
35. Note the hours of operation.
36. Label the adjacent land uses, instead of the owner's names. Include the land to the east.
37. The site photos show extensive chemicals on-site, including a large trailer mounted tank. Detail the chemicals' names, amounts, hazard/irritation rating, and locations.
38. Waste facilities, including wood processing, are subject to enhanced site plan standards. The following items can be added to the current site plan, on an additional site plan site, or letter-sized paper as appropriate.
39. Show and label the zoning and land uses within ¼ mile of the site, particularly any residential uses.
40. Discuss the characteristics of the Old Denton Road access, including current traffic volumes and impact of proposed facility on roads and traffic.
41. Show the locations of all equipment and machinery. Note the equipment/machinery's use.
42. Detail fire prevention and control.
43. Detail groundwater, drinking water and surface water protection including wash areas, stream or water course diversions, holding ponds and tanks.
44. Detail installation and maintenance of signage at the entrance to the facility that is clearly visible to the public and identifies the owner, operator, business address, telephone number and hours of operation of the facility
45. Obtain, maintain and have available on-site all required permits and comply with all federal, state and local regulations that relate to the collection, transportation, handling, processing and disposal of all materials for which the facility is approved.
46. Submit and maintain on-site an operations plan that addresses:
 - i. Provisions for preventing unauthorized wastes and materials from being brought to the facility;
 - ii. Procedures for identifying, handling, removing, transporting and disposing of unauthorized wastes and materials that may have been brought to the facility;
 - iii. Procedures for controlling water runoff, erosion, dust, odors, vectors and rodents;
 - iv. Procedures and employee training for fire prevention and control;
 - v. Litter control and cleanup; and
 - vi. Procedures for reporting and handling fuel and chemical spills.

47. Provide proof of financial security by submitting documents showing compliance with federal and/or state financial assurance requirements or by submission of performance bond sufficient to ensure that maximum amount of materials stored or accumulated on-site at any one time can be properly recovered and disposed of in the event that the owner/operator is unable to do so.
48. Comments may be revised when an updated site plan is submitted.
49. Informational comment: A detached monument sign more than 20 feet from a driveway or street intersection is allowed by right.
50. Informational comment: The Development Services Department may not issue a certificate of occupancy until the operator of such facility submits proof that the operation of the facility has been approved by all applicable federal and state regulatory agencies as required by law.

(Comments made by Platting (Subdivision Ordinance), Transportation/Public Works, Fire, Park & Recreation, and Water Department staff cannot be waived through the Zoning Commission and City Council. Approval of the zoning site plan does not constitute the acceptance of conditions.)

Stormwater

1. None noted as of 5/28/2025.

Fire


1. Fire Department Commercial Inspections is working with the occupant to resolve existing violations. A Certificate of Occupancy is required to continue operation.
2. Permits required for miscellaneous combustible storage.
105.3.3 Occupancy Prohibited Before Approval
315.2 Permit Required
3. Hydrant hose lay to all buildings on the site exceeds 500'. An additional hydrant required. Nearest hydrant is on a dead end main.
507.5.1(2) Fire Hydrants
4. Bulk piles of wood/mulch/compost limited to 2500 cubic feet.
105.5.31 Miscellaneous Combustible Storage.
5. Chapter 28 applies by definition of Agro-Industrial facility.
2802.1 Definition -Agro-Industrial
6. Fire apparatus access roads (fire lanes) shall be provided for buildings and facilities in accordance with Section 503.
2803.6 Fire Apparatus Access Roads
7. Portable extinguishers shall be provided in accordance with Section 906 for extra high hazards. Portable extinguishers shall be provided within 50' distance in travel from any machine producing shavings or sawdust.
2804.3 Portable Extinguishers
8. Bulk piles shall not exceed 25' in height, 150' width, and 250' in length. A permit is available to exceed this maximum provided that a written fire protection plan is approved.
2808.3 Size of Piles
9. Bulk piles shall be separated from buildings, property lines and adjacent piles or stacks by a distance of not less than 1 1/2 times the height of the pile. The distance between rows shall be a minimum of 30'. Approved fire apparatus access roads shall be provided within the separation space in accordance with Section 503.
2808.4 Pile Separation

10. The owner and operator shall develop a plan for monitoring, controlling and extinguishing spot fires and submit a plan to the fire code official for review and approval.
2808.10 Emergency Plan
11. Fuel dispensing from mobile tank to heavy equipment is present on site and must meet requirements of 5706.2.8 Dispensing from Tank Vehicles
12. Abandoned underground fuel tanks may be present on the site. Fire Dept has no record of these tanks.
13. Failure to recognize violations of the fire code by the fire code official does not waive the requirement of meeting minimum requirements of the fire code in the future.
It is the applicant's and the owner's responsibility to meet all minimum fire code requirements at all times.
14. The City of Fort Worth has adopted the 2021 International Fire Code as its current fire code at the time of this review. The City of Fort Worth has also adopted Amendments #25388-03-2022.
<https://www.fortworthtexas.gov/departments/fire/services/bureau>.

T/PW Engineering

1. FYI: Gate location will need to follow the requirements of the TEM.
2. FYI: Sidewalks and street lights may be required at CO permit if current conditions do not meet city standards.

DSD Water Engineering

1. Please refrain from emailing DSWS separately to clear holds; Early permit review requests by email or in person will not be accepted. All revisions need to be submitted through Accela permitting system so that they are recorded and tracked appropriately.
 2. Water taps less than 2 inch to be installed by Field Ops (817)392-8246 taps greater than 3 inch will need to go through IPRC or WMP.
- 

HW GATEWAY
LOGISTICS LTD

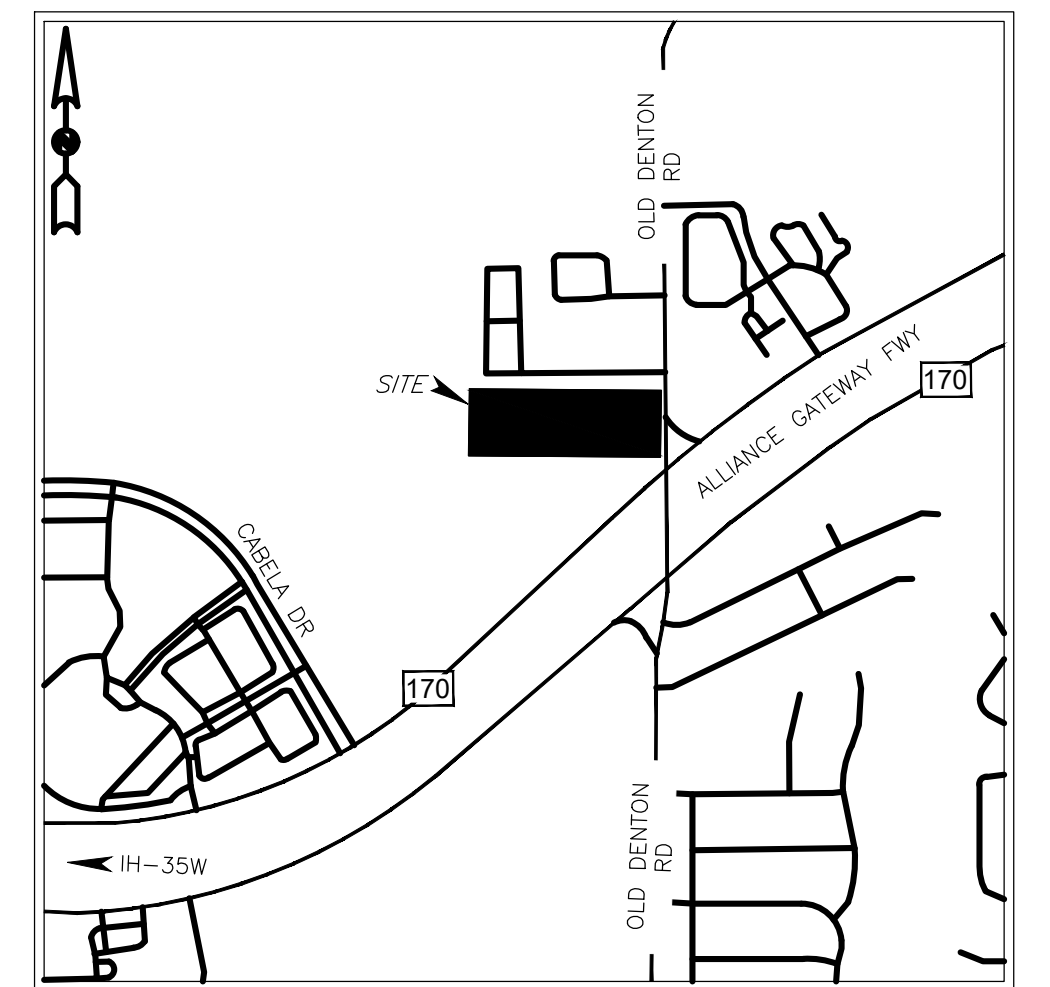
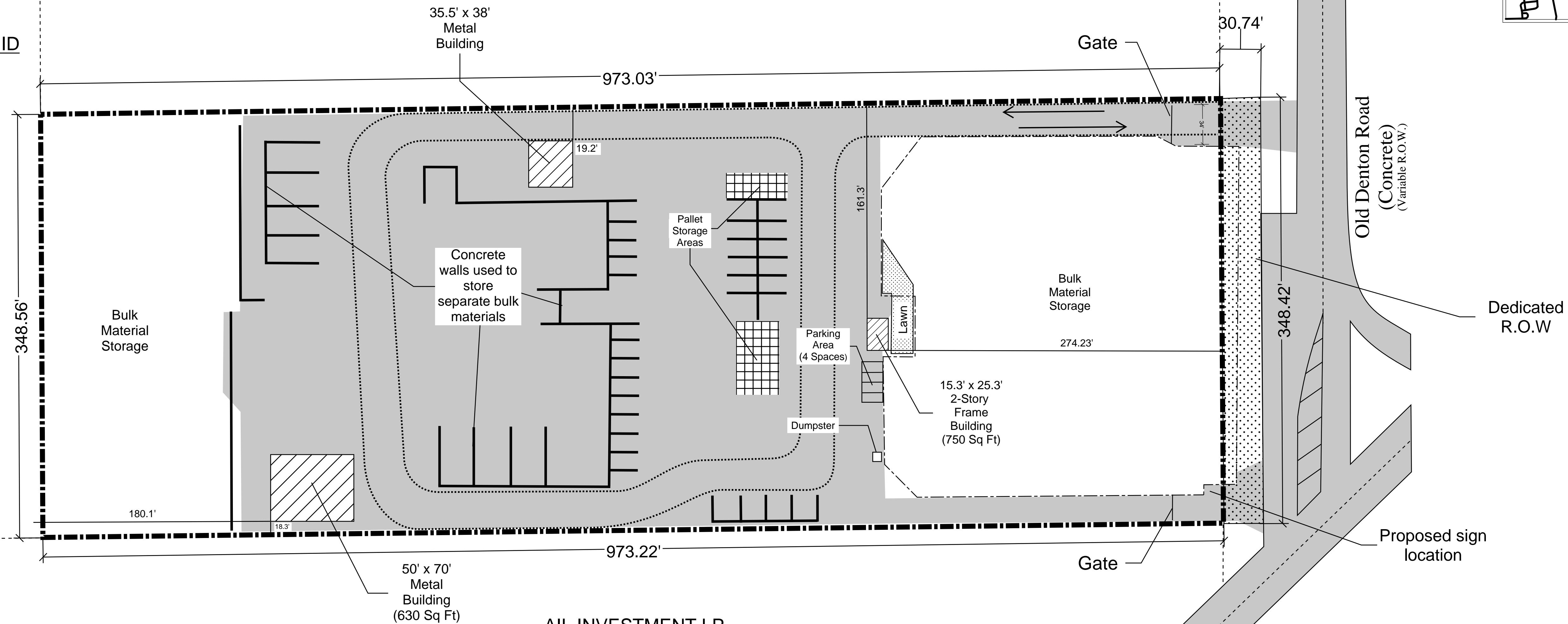
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06793606

Zone Type K

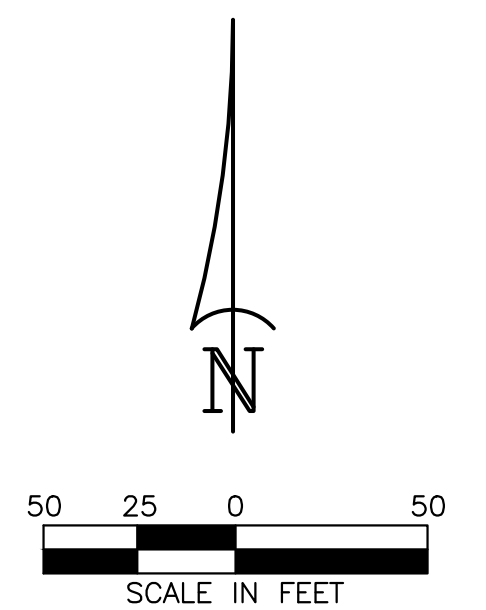
KELLER DISTRIBUTION
ILP LLC

Tarrant County Parcel ID
42822767

Zone Type K



VICINITY MAP
NOT TO SCALE



AIL INVESTMENT LP

Tarrant County Parcel ID
41444930

Zone Type G

All combustible materials
will be stored 50 feet back
from property line,
non-combustibles at least
10 feet from property line

Legend:

Property boundary:

Concrete:

Fire lane:

- This project will comply with Section 6.301, Landscaping.
- This project will comply with Section 6.302, Urban Forestry.
- All signage will conform to Article 4 ,Signs.
- All provided lighting will conform to the Lighting Code

LAND USE TABLE

NUMBER OF RESIDENTIAL LOTS	N/A
RESIDENTIAL ACREAGE	N/A
NUMBER OF NON-RESIDENTIAL LOTS	1
NON-RESIDENTIAL ACREAGE	7.787
PRIVATE PARK ACREAGE	N/A
PUBLIC PARK ACREAGE	N/A
STREET AND ALLEY ACREAGE	N/A
NET ACREAGE	7.787

Site Location

The Organic Recycler
13001 Old Denton Road
Fort Worth, TX 76177

Legal Description

ORGANIC RECYCLER ADDITION

Block 1 Lot 1

Parcel ID:

43116950

4/29/2025

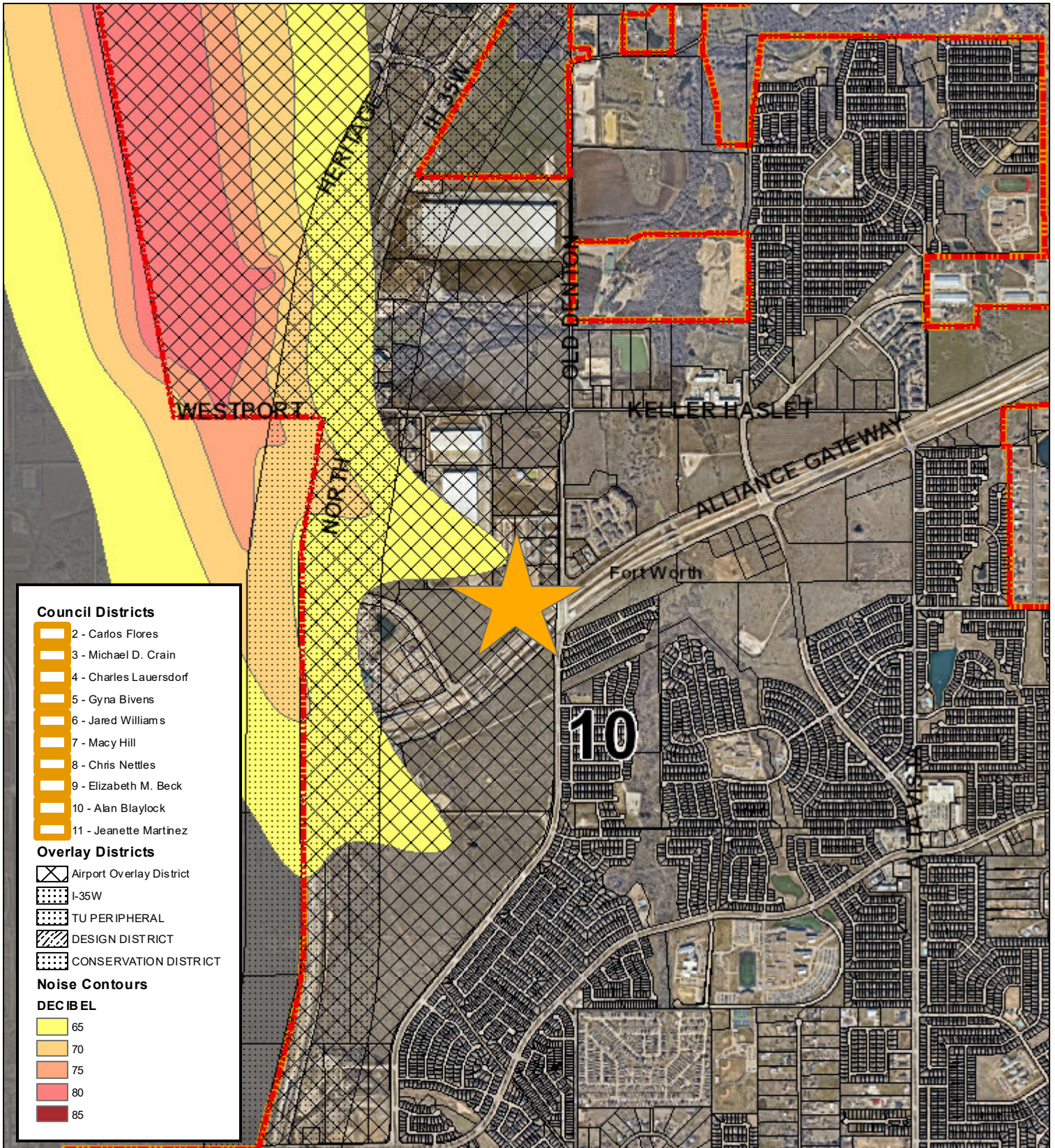


THE
ORGANIC
RECYCLER

The Organic Recycler
4825 Forest Hill Circle
Forest Hill, TX 76140

Zoning Case Number:

Area Map



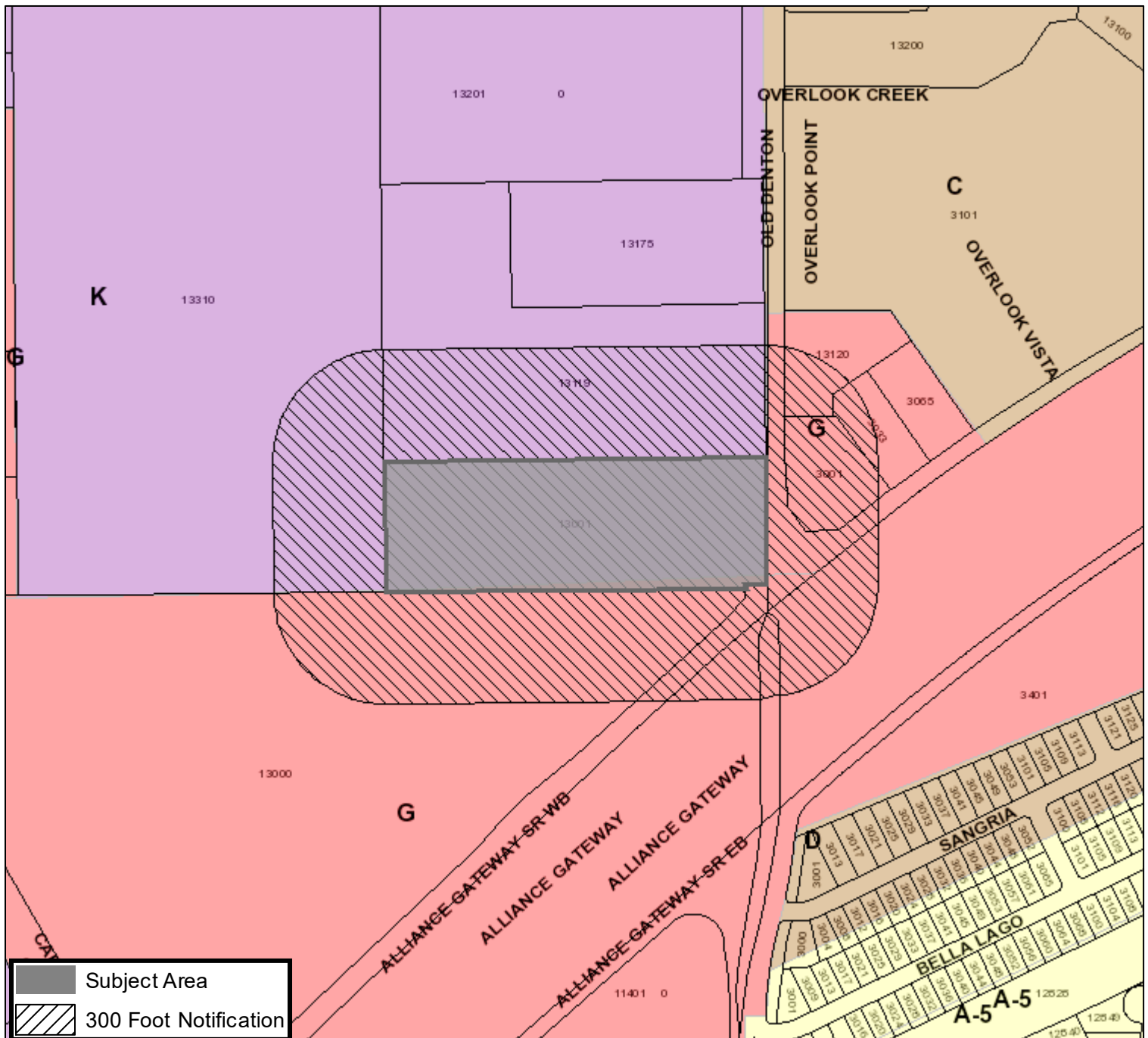
0 1,000 2,000 4,000 Feet



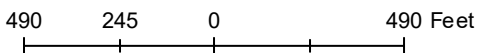
ZC-25-090

Area Zoning Map

Applicant: TOR Holdings, LLC
Address: 13001 Old Denton Road
Zoning From: K
Zoning To: Add CUP for wood recycling and composting
Acres: 7.787
Mapsc0: Text
Sector/District: Far North
Commission Date: 6/11/2025
Contact: 817-392-8190



Future Land Use



A Comprehensive Plan shall not constitute zoning regulations or establish zoning district boundaries. (Texas Local Government Code, Section 213.005.) Land use designations were approved by City Council on March 6, 2018.



Aerial Photo Map

