

Alamo, Austin, and Lone Star chapters of the Sierra Club

Bexar Audubon Society

Austin, Bexar and Travis Green Parties

Bexar Grotto

Boerne Together

Bulverde Neighborhood Alliance

Bulverde Neighbors for Clean Water

Cibolo Nature Center

Citizens for the Protection of Cibolo Creek

Comal County Conservation Alliance

Environment Texas

First Universalist Unitarian Church of San Antonio

Friends of Canyon Lake

Friends of Dry Comal Creek

Friends of Government Canyon

Fuerza Unida

Green Society of UTSA

Guadalupe River Road Alliance

Guardians of Lick Creek

Headwaters at Incarnate Word

Helotes Heritage Association

Kendall County Well Owners Association

Kinney County Ground Zero

Leon Springs Business Association

Medina County Environmental Action

Native Plant Society of Texas – SA

Northwest Interstate Coalition of Neighborhoods

Preserve Castroville

Preserve Lake Dunlop Association

Preserve Our Hill Country Environment

San Antonio Audubon Society

San Antonio Conservation Society

San Geronimo Valley Alliance

San Marcos Greenbelt Alliance

San Marcos River Foundation

Save Barton Creek Association

Save Our Springs Alliance

Scenic Loop/Boerne Stage Alliance

Securing a Future Environment

SEED Coalition

Signal Hill Alliance

Sisters of the Divine Providence

Solar San Antonio

Texas Cave Management Association

Trinity Edwards Spring Protection Association

Water Aid – Texas State University

Wildlife Rescue & Rehabilitation

Wimberley Valley Watershed Association

January 3, 2022

Honorable Mayor Nirenberg and Members of City Council,

The Greater Edwards Aquifer Alliance, joined by undersigned, wish to draw your attention to an item that might be submitted for your approval in the near future; namely a request from the developers of the Guajolote Tract to amend the City's North Sector Plan designation of this site to allow for higher density development.

The Guajolote Tract is located off Scenic Loop Road within the City's ETJ, the Edwards Aquifer Contributing Zone, and an area within the City's North Sector Plan designated as "Country". Lennar Homes of Texas Land and Construction, Ltd. is seeking permission to build 3,000 homes on 1,160 acres – a plan that would not comply with the current designation.

The "Country" land use designation for RESIDENTIAL is described as "Rural Homestead, Generally: Large tract detached single family housing; Served by well water and septic systems; Lots greater than 10 acres. Related Zoning Districts: RP, FR.<sup>1</sup>"

Within the values elucidated in the North Sector Plan, preserving the natural resources of the land, including the Edwards Aquifer, is identified as invaluable to the community now and in the future. The Aquifer's protection is vital to the City's development. According to the North Sector Plan, the area's location within the Edwards Aquifer Contributing Zone was a factor in determining the "Country" designation as suitable for this area. Threats to the high quality of our Edwards Aquifer water supply from stormwater pollution and waste water disposal make this area unsuitable for high density development.

Further studies bear this out. A 2020 study by Southwest Research Institute (SwRI) funded by the City of San Antonio's Edwards Aquifer Protection Program developed an integrated hydrologic computer model to evaluate the impact of different types of wastewater disposal facilities on the Edwards Aquifer. According to Dr. Ronald Green, SwRI technical advisor and project manager for the study, SwRI considered a range of hypothetical scenarios of the size and capacity of the hypothesized wastewater facilities consistent with possible residential development in the Helotes Creek Watershed area. Their results predicted that installing additional wastewater systems in the region, regardless of type, would increase the amount of wastewater discharged to the environment and

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Page 43, Chapter 3: North Sector Plan Elements  
<http://www.sanantonio.gov/Portals/0/Files/OMA/NorthSectorPlan20100730eCML.pdf>

significantly degrade the watershed and the quality of water recharging the Edwards Aquifer.<sup>2</sup>

According to the North Sector Plan, “amendments should only be considered after careful review of the request, findings of fact in support of the request, and a public hearing by the Planning Commission (PC) and City Council.” “The required findings of fact should include, but may not be limited to: ...

- The amendment must constitute an overall improvement to the Sector Plan and will not solely benefit a particular landowner or owners at a particular point in time.
- The amendment must uphold the vision for the future of the North Sector Plan.”<sup>3</sup>

We support the validity of the “Country” designation and would object to any amendment that would accommodate higher density development of this area.

Of concern to GEAA and, we hope to you as elected representatives of the City, is a plan to locate a waste water treatment plant on the Guajolote site that will discharge directly into waterways that recharge the Edwards and contribute to San Antonio's potable water supply. We do not believe that State standards for permitting direct discharges are adequately protective and, thus, could diminish the quality of San Antonio's principle source of water.

Similarly, we have concerns about the impacts of polluted stormwater from a high density subdivision on area waterways. Our research indicates that within three to five years after similar high density developments are populated contiguous waterways wind up on the Texas Commission for Environmental Quality's impaired waterbodies list.

Past dealings with Lennar Homes have been problematic. Last year GEAA and Bulverde Neighborhood Alliance negotiated a settlement in a suit against Lennar Homes and their contractors, including Pape Dawson Engineers, for violations of the Federal Clean Water Act related to the 4S Ranch residential development. This experience leads us to conclude that the City, San Antonio Water System, and all parties exercising regulatory control over the proposed Guajolote development should proceed with the utmost caution and should enforce any protections within their power.

In conclusion, we urge you to deny any request for amendment to the North Sector Plan from the developers of the Guajolote tract. Should you have any questions or wish to discuss this matter further, please contact us at your convenience.

Respectfully,

Annalisa Peace  
Executive Director  
Greater Edwards Aquifer Alliance

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<sup>2</sup> <https://www.swri.org/press-release/impact-wastewater-systems-edwards-aquifer-hydrologic-computer-model>

<sup>3</sup> Page 55, Chapter 3: North Sector Plan Elements  
<http://www.sanantonio.gov/Portals/0/Files/OMA/NorthSectorPlan20100730eCML.pdf>

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CC: Planning Commission Liaison, Jennifer Hyatt