

MAY 29, 2016 8:32 A.M.
FLASH FLOOD WATERS FLOWING ACROSS
THE OLD RIVER ROAD RV PARK CONSTRUCTION SITE
KERR COUNTY, TEXAS

Permit to Build and Alter the Floodplain Approved by the Kerr County Floodplain Administration



EPILOGUE

In December of 2016, I heard that John Hewitt, the Kerr County Flood Plain Administrator who served as a consultant for the Old River Road RV Park, and who is featured prominently in this study, had “left” the employment of Kerr County Road and Bridge in October of 2016. I have not seen any media coverage of this change, and as of February 19, 2017, the Kerr County website still lists Hewitt as the Kerr County Flood Plain Administrator (FPA.)*

Kerr County Road and Bridge Engineer Charlie Hastings is now acting as the Flood Plain Administrator. Hastings is not qualified for this position. A year or so ago when he toured wetlands on the Naylor Ranch, with Commissioner Tom Moser, I pointed out that our pond was impounded in the 1960s, and that it was originally an arroyo. Hastings then asked me, “What is an arroyo?” I think the Kerr County Engineer and Flood Plain Administrator should know what an arroyo is.

The step that is needed, to protect the citizens of Kerr County from the hazards of flash floods, is to remove the office of Flood Plain Administration from the Dept. of Road and Bridge all together, because its placement in that department is a conflict of interest. Charlie Hastings in his role as Engineer for Road and Bridge is responsible for overseeing or actually performing the acceptance of bids to purchase gravel for road building and repair. The same gravel companies that Road and Bridge buys gravel from—Martin Marietta most prominently—also apply to the Flood Plain Administrator for permits to mine gravel in the floodplain. This creates yet another serious conflict of interest.

*Footnote, added January, 2018: The Commissioner’s Court removed John Hewitt from the office of Flood Plain Administrator, probably because of pressure from FEMA. However, Hewitt probably does more work now than he did before, because he receives the vast majority, if not all, of the consulting engineering jobs for the County that have anything to do with the floodplain.

SAY “NO!” TO THE DANGEROUS OLD RIVER ROAD RV PARK

Photos Showing the Results of Flash Flooding Sunday, May 29, 2016,

Starting around Midnight, at the Old River Road RV Park—

Currently Under Construction, with Entry from Center Pt. River Road, at Brink’s Crossing

In 2008, in spite of the objections of neighbors and the community, the Kerr County Commissioner’s Court granted a permit for Martin Marietta (MM) to mine gravel in the floodplain, at the NE corner of the H.M. Naylor Ranch. Engineer Bruce Motherall completed a study for MM and signed, as a certified engineer, a “NO RISE” document that MM’s alterations to the floodplain would not create any flooding or water rise. An Arkansas engineer named Purkeypile conducted a study for the Old River Road RV Park (ORRRVP) that did not even do any measurements on the actual ORRRVP land, but instead used figures from a “model” that was nothing like the actual land parcel. Purkeypile also signed, as a certified engineer, a “NO RISE” document that promised that ORRRVP’s alterations to the floodplain would not result in a “rise” in the case of flooding.

There has not been a major flood in this area since 2002. Owners of the H.M Naylor Ranch had photos of the ORRRVP parcel showing Nowlin’s Hollow waters flowing across this property in 2007, 2010, 2012, 2015, and this year, 2016. Objections to ORRRVP’s development in a flood zone have been ignored by the Kerr County Commissioners and by the Flood Plain Administrator John Hewitt; all officials know that FEMA made a mistake and did not map this floodplain. All locals, including neighbor Edward Wellborn, whose family has owned their ranch since 1860, knew that ORRRVP was being built in a flood hazard zone. So why has construction continued? Because Kerr County Commissioner Tom Moser supports the ORRRVP and is working to get grants and spend millions to DRAIN Nowlin’s Hollow—all so that a substandard, shabby RV Park can expand.

BOTH ENGINEERS WERE WRONG AND NEGLIGENT IN THEIR NO-RISE CERTIFICATIONS: In the early morning of Sunday, May 29, 2016, the area received 11 inches of rain, and waters from Nowlin’s Hollow, as predicted by all the neighbors, filled up the Martin Marietta gravel pit and overflowed onto the floodplain to the south, the ORRRVP site. Again, these waters flood the ORRRVP regardless whether a gravel pit is there or not. The attached photos graphically show Nowlin’s Hollow waters flowing across the RV Park site. In addition, waters that flow across the Naylor Ranch and meet Nowlin’s Hollow also flooded onto the ORRRVP.

(Continued on next page)

(Continued) Waters can be seen above ground on the north end, then they disappear briefly in the center, going underground, then reappear further down towards the river. These waters are flowing through the area that ORRRVP is planning on locating their massive septic system, just above the Guadalupe River. ORRRVP is also applying to TCEQ for a “Public Water System” which would deplete all the private property wells in the area (added note: They received the permits for the watersystem and have already installed it.

The ORRRVP plain cannot be seen from Hwy. 27 or River Road. No one knew that the ORRRVP had flooded except the neighboring owners of the H.M. Naylor Ranch. Precinct Two Commissioner Tom Moser, who was out reviewing the flooding on Sunday morning, refused to visit the Naylor Ranch and see the RV Park flooding. **IN SPITE OF THESE PHOTOS SHOWING FLOODING, KERR COUNTY COMMISSIONERS ARE STILL APPROVING OLD RIVER ROAD RV PARK, AND CONSTRUCTION CONTINUES IN THE FLOODPLAIN.**

ACCESS, EGRESS: Also included in this document are photos of flooding at Brink’s Crossing, just below the RV Park, **on the only road that provides access to the RV Park during flooding—which is proposed to have over 300 RVs parked on the plain.** According to Edward and Verde Wellborn, Nowlin’s Hollow waters were flowing over Hwy. 27 early Sunday morning at its intersection with Sutherland Road, which is the only available access onto Hwy. 27 for RVs exiting the Old River Road RV Park. When I turned onto Sutherland Road to go to Brink’s Crossing at 8 a.m. Sunday morning, TXDOT was just taking down barricades they had erected on Hwy. 27, which had closed off traffic on that highway for some time. It’s incredible that the County is continuing to ignore evidence from residents that this development is a real threat to public health and safety!

REVISED 6-22-2016, AT THIS TIME THE MARTIN MARIETTA GRAVEL PIT IS STILL FULL OF WATER—Gravel Pits are just a water grab! All of this water should be going to neighboring landowners’ wells and back to the Guadalupe River!

Please tell all of your neighbors and friends about this hazardous condition and about the threat to health and safety—not to mention the water depletion—posed by the Old River Road RV Park!

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 For copies of this document call, email, or write to us

SUMMARY

1. Old River Road RV Park, currently under construction east of Kerrville, Texas, located east of the Naylor Ranch (physical address 5373 Hwy. 27), is located in a flood zone. It is a very serious hazard to the public's health and safety.
2. The floodplain permits that have been issued to ORRRVP by Kerr County should be withdrawn, because they are based on an inaccurate FEMA floodplain map:
 - The FEMA floodplain map does not show 5 Guadalupe River tributaries that cross or adjoin the H.M. Naylor Ranch and cross over onto the ORRRVP property; these tributaries contribute substantially to the overall water load going into the river at the RV Park.
 - The FEMA floodplain map is not accurate because the area is one of karst topography, and there are numerous streams that run underground, suddenly appearing during a flood, and FEMA has not mapped these streams.
 - The FEMA floodplain map is not accurate because the engineering done by John Hewitt, Kerr County Floodplain Administrator, and Richard "Dee" Purkeypille, Engineer for Old River Road RV Park, is substandard—they use models that are not applicable, and elevations to determine the floodplain. The entire site is flooded with pressurized waters coming from a massive artesian spring system, and elevations alone do not determine the flow.
 - The FEMA floodplain map is not accurate because there are little or no records of the enormous water loads at the Naylor Ranch Arroyo-Pond just upstream and at Brink's Crossing, directly below the ORRRVP; and there have been no interviews, historic research, or any other attempts to determine the flow at this confluence—the Nowlin's Hollow-Turtle Creek confluence.
3. John Hewitt, the Kerr County Floodplain Administrator, is guilty of negligence and fraud due to the serious conflict of interest he created when:
 - He contracted with Old River Road RV Park to be one of their construction engineers
 - He drew up plans for ORRRVP in the floodplain
 - He received compensation from a developer that he was responsible to regulate
 - He wrote letters to the Kerr County Floodplain Administration urging them to approve ORRRVP's floodplain permit and plans
 - He refused to contact FEMA and ask to have the error in the FEMA map corrected, as instructed by Kerr County Commissioner Tom Moser, because by doing so ORRRVP would have to stop construction, and he would be violating his engineering contract with them;
 - The Kerr County Floodplain Administrator cannot have two masters. He cannot review permitting to build in and alter the floodplain, submitted by developers—while at the same time he has been hired by those same developers to help them design a development on the floodplain, and no doubt to advise them how to "get by" floodplain regulations. Of course, Hewitt received money from them. Hewitt's overreaching responsibility is to protect the citizens of Kerr County from loss of life and property in the event of a flash flood. Hewitt cannot do this, while working for the ORRRVP.
 - Hewitt is guilty of fraud because he had been told, and shown, that the FEMA map was wrong, yet in 2011 he was in charge of a FIRM remapping, and he did not change the FIRM to reflect the floodplain's true conditions, but instead approved a FIRM that would allow ORRRVP to build.
4. The septic system designed for the ORRRVP is substandard, built in the Special Flood Hazard Zone, is built on unsuitable soils, and is built under the supervision of the Kerr County Environmental Health Services Dept., which is not qualified to monitor the system and insure its safety.

The photos on the following pages are documentation that the land parcel currently under construction for the Old River RV Park floods.

In the early morning hours of May 29, 2016, the area received 11” of rain in 3 hours.

With this rain the waters of Nowlin’s Hollow, a massive arterial spring system originating in the hills above the airport, began to pour out of the karst limestone caverns and underground tunnels it normally occupies, to flow above the ground.

Martin Marietta Industries in 2008 started mining gravel in the Nowlin’s Hollow floodplain, just below Hwy. 27, north of the ORRRVP site. A permit to mine in the floodplain was granted by the Kerr County Commissioner’s Court, over the objections of the adjacent H.M. Naylor Ranch, and many members of the community. What would happen to this big hole in the ground when Nowlin’s Hollow flooded?

On May 29, we found out.

The ORRRVP plain cannot be seen except from one place: The historic H.M. Naylor house, which sits on a high plateau overlooking the valley. It cannot be seen from Hwy. 27. It cannot be seen from the entry to the ORRRVP, on River Road. It cannot be seen when traveling on River Road.

At 2:40 a.m. I was awakened by the flash flood alert text message being received on my cell phone. I had heard the heavy, driving rain for hours, and I texted my friend Frances Lovett that “this may be “the big one”—or at least a “medium one.” I could hardly wait for daylight to see the water that I knew was pouring over the Old River Road RV Park, being built in the floodplain below our house. At daylight I walked out into the backyard, barefoot, and looked across the valley, towards the river. On this morning, the river was roaring. We had moved here in 2003, and had never seen a major flood. Like everyone else, when we moved here, I had no idea that this area is one of the worst for flash floods in the world, and that it is called “Flash Flood Alley.” The roaring of the Guadalupe River on this morning was quite an experience; no one who has ever heard a river roaring, in flood, will ever forget it.

I grabbed my camera and climbed up on the roof of my house to see the panorama. It was quite a sight. The Martin Marietta gravel pit had filled up with water and was overflowing onto the Old River Road RV Park. Nowlin’s Hollow, no longer contained underground, was flowing across the RV Park to the Guadalupe River. In less than a year’s time, there would be over 300 permanent RVs, houses, swimming pools, roads, manager’s houses, “guest houses,” a restaurant/cantina—and a huge septic system, right on the Guadalupe River—down on the plain below me, which was now covered with floodwaters. IT SHOULD NOT BE ALLOWED TO HAPPEN.



View from the H.M. Naylor Ranch roof, looking east; “lake” at center left is the Martin Marietta gravel pit, begun in 2008; in center are Nowlin’s Hollow waters flowing across the RV Park land, soon to be developed. All photos taken by Matthews on Sunday, May 29, 2016, early morning. Red arrow shows Nowlin’s Hollow waters on ORRRVP future RV sites. For plans of these sites, see the PDF, “ORRRVP, Plans by John Hewitt, Kerr County Floodplain Administrator.”





Nowlin's Hollow waters travelling SW on their inexorable path to the Guadalupe River, in the Nowlin's Hollow-Turtle Creek Basin. Evidence presented to Kerr County—Heather Stebbins, Kerr County Attorney; John Hewitt, Kerr Co. Flood Plain Administrator; our Commissioners; and Ray Garcia, Kerr Co. Health and Environmental Services—and to FEMA, the U.S. Army Corps of Engineers, and TCEQ that the Old River Road RV Park was building atop a floodplain has been ignored. **This minor flooding event has provided irrefutable evidence of the validity of our concerns! But will flood officials listen??**



View looking SW from Naylor ranch rooftop, to ORRRVP's septic location, in center. The Guadalupe River is the line of trees in the center of the photo. Sewer, water, and utility "stations" can be seen on the floodplain. Nowlin's Hollow waters run across this plain, sometimes above ground, sometimes below ground, on their way to replenish the Guadalupe River.

Old River Road RV Park, on Sunday evening, May 29, 2016. View looking SE from Naylor Ranch pond. Waters from Nowlin's Hollow and 4 other tributaries converge on the Naylor Ranch pond, which was originally an arroyo, until the pond was dammed in the mid-1960s. This is a PRE-EXISTING CONDITION. The waters tore down the Naylor Ranch fence and joined Nowlin's Hollow waters running on the RV plain (see pages 7 & 14), to fill the proposed area for the ORRRVP's septic system with water and debris. Kerr County Floodplain Administrator John Hewitt granted permits for ORRRVP to build on this floodplain, in spite of many meetings with Matthews which included evidence of past flooding. Note station on the left, in foreground, has been overturned by floodwaters. This arroyo gets waters from miles away, from tributaries that begin in the hills above the airport and flow under Hwy. 27. The entire area is karst topography so it is impossible, without an engineering report with remote sensing, to tell where and how the waters flow. Neither FEMA, Kerr County, TCEQ, or any other governmental agency has made any attempt to undertake this mapping. In fact, the Kerrville Airport is built on massive craters created by this karst topography, also called sinkholes or solution sinkholes. (Source: 1947 photo, Naylor Ranch archives). This storm created a minor flood; what will happen when we have another major one? Use your imagination.





Water Running Across ORRRVP's SW corner, 5-29-2016. View looking north from the SE corner of the Naylor Ranch, by Arroyo-Pond. The flood event happened at 2:40 a.m., this is about 8 a.m.



The flash flood on this occasion, May 29, 2016, was a MINOR flooding event.

This photo shows one of the RV Park's "stations" for electrical, etc. knocked over by floodwaters.



View looking NE from the SE corner of the Naylor Ranch, by the Naylor Ranch Arroyo-Pond. Waters from 5 tributaries, unrecognized by local officials since they are not on the FEMA floodplain maps, converge on this arroyo during times of flood. Water and debris pulled down the fence between the ranch and the ORRRVP, in this photo in the center.



Photo from the H.M. Naylor Ranch, showing the debris left by floodwaters which come from the NW corner of the ranch, from Silver Creek. These waters empty into the arroyo, which is in the middle background. One of the ranch's cattle feeders was swept away in this flood!



Nowlin's Hollow floodwaters on the Drymala property bordering Hwy. 27; in the background, at left, can be seen the Martin Marietta gravel pit. This is not a good location for a portable toilet business, as the site is often flooded! (What agency overlooks this type of business?) The portable toilet business is located below the hill on the right. How much of this went into the floodwaters? (See page 31.)



Brink's Crossing, Sunday morning May 29, 2016. The waters shown, over the road, are a branch of the Guadalupe River; this is not even the main low water bridge crossing, which can't be seen in this photo, it is over the hill and further north. The Old River Road RV park is located directly on the right. **NO VIEW OF BRINK'S—CAN NOT GET TO IT FROM THIS SIDE. Note how high floodwaters came on this road during the night, evident by the debris shown on the left in the fenceline.**



Brink's Crossing. Floodwaters are shown on the left, from a second branch of the Guadalupe River that appears during times of flood. On the right is the Old River Road RV Park, which is currently under construction. In an EPA map dated to 2009, the "Guest House" has been built in a "Special Flood Hazard Zone" (see page 21.) We're not sure what happened between 2009 and 2015 that allowed Kerr County Flood Plain Administrator John Hewitt to grant ORRRVP a permit to build here. We do know that Hewitt was hired as a paid consultant to ORRRVP, while he was Kerr County Flood Plain Administrator.



Floodwaters at Brink's Crossing, at the Nowlin's Hollow/Turtle Creek confluence on the Guadalupe River, on 4-16-2010, looking NE. ORRRVP is building in the area above the water on the upper left. There was 49' of water at this crossing during the disastrous 1978 flood. The confluence is the result not only of 3 major streams coming into the river from the south, but also of 5 Guadalupe River tributaries—one, Nowlin's Hollow, a massive flow—coming into the confluence from the north and west.



Above, the same view as the previous page, taken on July 4, 2016, after the medium-degree flood on May 29, 2016. Note the huge cypress that has been left behind by the floodwaters.

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Old River Road RV Park

Center Point River Rd

300 yds

bing EnviroMapper

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A map from the EPA dated to 2009 that shows much of the construction going on at the Old River Road RV Park to be in a “Special Flood Hazard Zone.” Note that the Naylor Ranch Arroyo-Pond, the floodplain around the pond, and a large swathe of the field to the west of the ranch is also included in this “Special Flood Hazard Zone.” Although this map is not entirely accurate—it does not map Nowlin’s Hollow flow over the RV Park, or Silver Creek—what is here needs to be expanded. This map was ignored by Kerr County FPA John Hewitt.



ORRRVP's entry, located just above Brink's Crossing. The tree at the right hand side of the photo on page 18 is just to the left of this entry. Floodwaters came very close, if they did not reach, this drive. Once the Samuel Houston Wellborn Ranch, Edward Wellborn remembers his father said that during the major 1930 flood, the main house site was not flooded—but the rest of the entire ORRRVP parcel was underwater. According to Ernest Wellborn, Indians had told HIS father that they had seen the entire valley covered with water, from mountain to mountain (this part of the Guadalupe River valley is located inside a ring of mountains.) The RV Park's acreage is subject to flooding often. Butch Lackey, a well-known Center Point resident now deceased, told the author that he remembered working on this property, dragging massive cypress trees out of the RV Park's north field, after the trees were deposited on the field by floodwaters. Floodwaters from Nowlin's Hollow meet floodwaters from the Guadalupe River and back up, all the way to what is now the Martin Marietta gravel pit.



Photo above was taken in April of 2007; it shows the same Nowlin's Hollow waters crossing the future RV Park development as those shown on 5-29-2016. View is from the H.M. Naylor Ranch house backyard, and this is BEFORE the Martin Marietta gravel pit was installed. Photos from the years 2007, 2010, 2012, and 2015—all showing these waters, above ground—were shown to all government agencies, and because FEMA has mapped this area wrong, and correcting the mapping would stop the RV Park development, all of the evidence has been ignored. Photo: H..M. Naylor Ranch Archives

The following 5 pages show an aerial photograph that was taken by H.M. Naylor, the builder/owner of the H.M. Naylor Ranch, in 1946. This photograph reveals that the entire area is karst topography—pure limestone that over time has been eroded by water, creating caves, underground waterways, and sinkholes.

The Kerrville Airport is actually built on top of solution sinkholes!

This is why floods and the path of waterways are difficult to determine without an extensive engineering study that uses ground-penetrating radar. Just because there isn't water on the top of the ground doesn't mean it isn't there!

Photo: H.M Naylor Ranch Archives

FIND THE CRATERS/CIRCLES!!

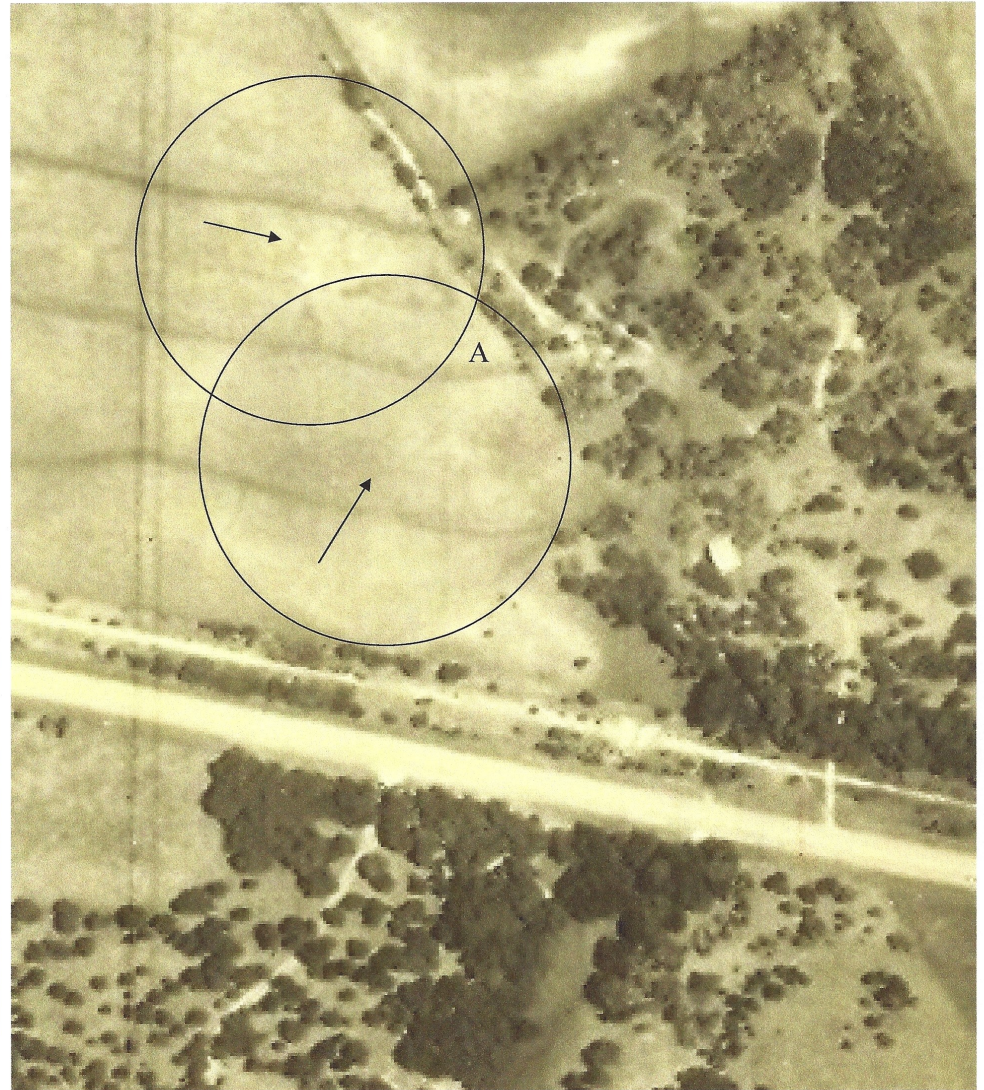
The solution sinkholes have notable centers. Fractures in the limestone run from the edge of the craters in a straight line, to the center of the craters. Because water is bubbling up from these fractures, trees can be seen growing on these straight, radial lines, from the edges to the center. Look for semi-circular "lines" in the landscape.



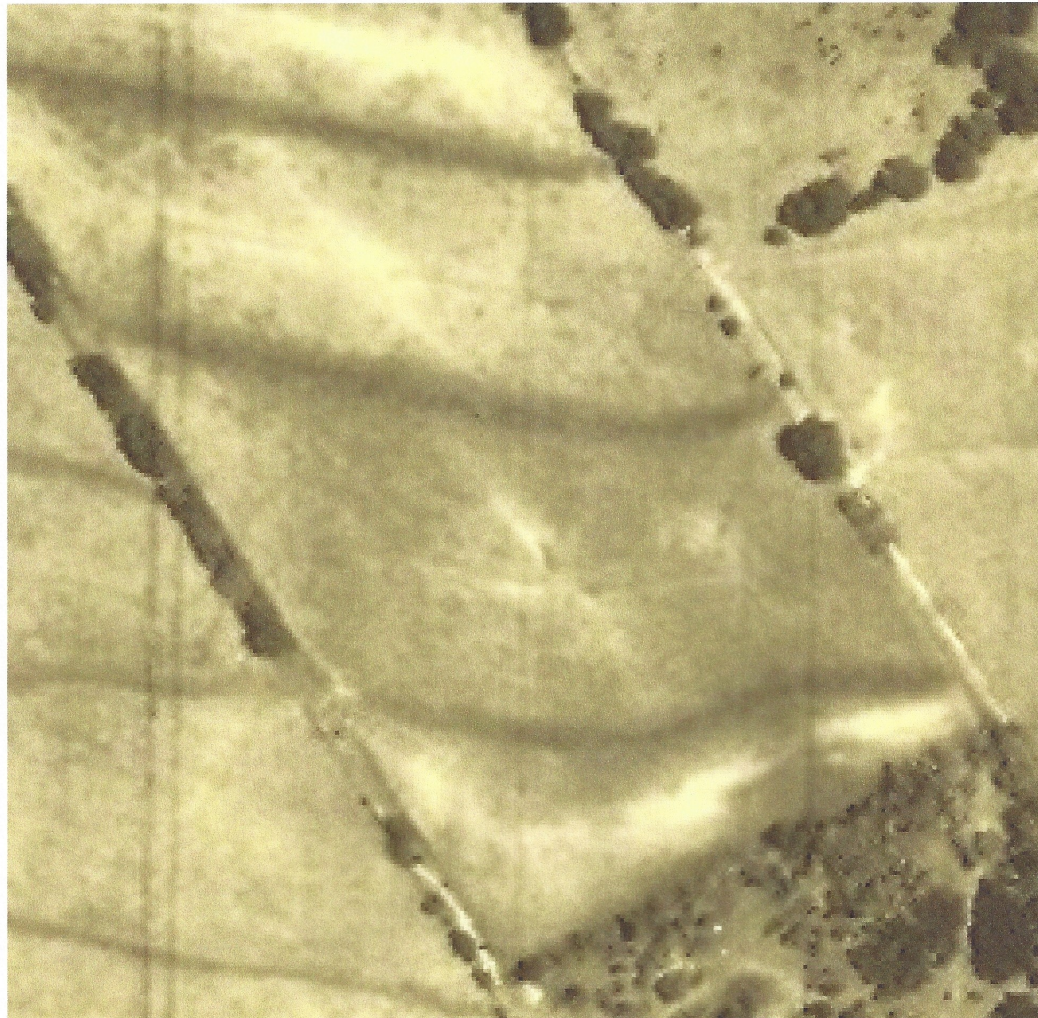
Very fine aerial photograph of the area, with high resolution, taken during the construction of the H.M. Naylor Ranch house c. 1946. The construction of the airport was begun in 1942, but it is still to the west, and not visible in this photograph. Same view is shown on the right, with "craters" delineated. Photo: Naylor Ranch Archives.



The most compelling crater is marked "A." In an interview with Edward Wellborn (2-13-2016), whose family owned the property adjacent on the west of his current ranch—where he still lives—he stated that "A" was farmland and had never been developed or altered for anything else, to his knowledge, which would preclude the crater being man-made. Taken in 1946, this is before pivot irrigation was available. There is another impact crater on the north end of the Wellborn property. There are actually more craters that we have not notated.

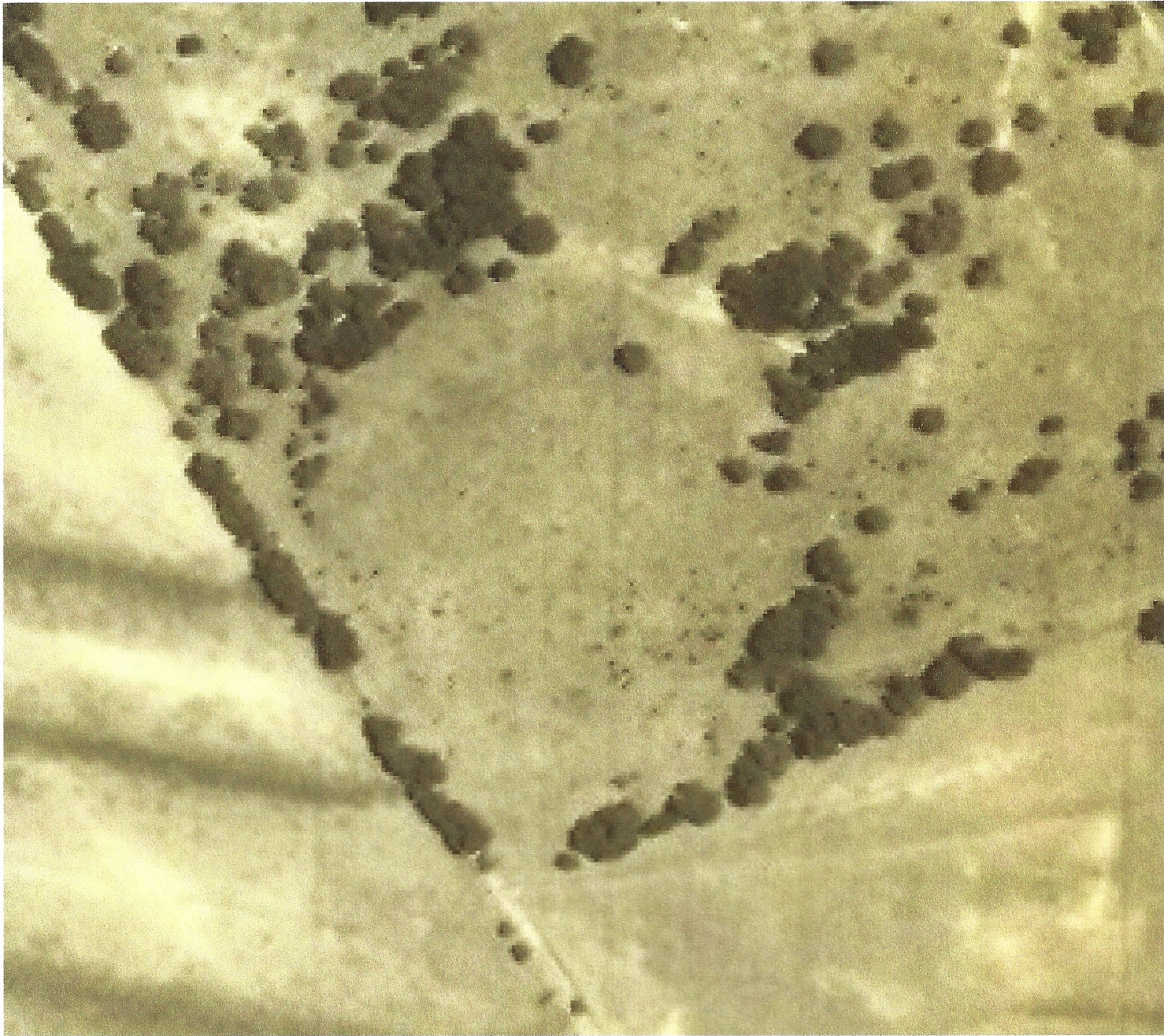


Above, and on the next page: A detail of Crater "A" shown on the previous page, from 1946. All evidence of this solution sinkhole crater has now been covered by the Kerrville-Kerr County Airport. Another crater can be seen on the NW, with its center visible.



On this page, a detail of Crater “B,” shown on the previous pages, in a 1946 aerial. This crater was destroyed by the expansion of the airport. The center of the solution sinkhole is clearly visible.

Note: Although the visible evidence of the crater was destroyed with the expansion of the airport, the actual crater is still there—under the airport runway! When the area water table is depleted, these solution sinkholes could collapse, and with it the airport runway!



Above, a detail of Crater "C" shown on the previous pages. From a 1946 aerial.



A crater on the H.M. Naylor Ranch, centrally located, just south of Highway 27.



Note how the trees in Crater “E” radiate along straight lines to a central point. Due to fracturing of the limestone, and resultant groundwater seepage.

The red arrow is pointing to the center of the sinkhole. With the El Nino rains of 2015-2016, the underground waterways beneath this sinkhole filled up, and water began bubbling out of this central point.



NO GRAVEL MINING TODAY!! Martin Marietta gravel pit filled with waters from Nowlin's Hollow, massive Guadalupe River tributary, Monday morning May 30, 2016, 10 a.m. Water is still flowing over the ORRRVP future site, see red arrow.



3-31-2007: Nowlin's Hollow floodwaters flowing past the NE corner of the H.M. Naylor Ranch, on their way to the Guadalupe River. The fence line in the center of the photo delineates the new Martin Marietta gravel mine site—to the left of the fence line—and what is now the ORRRVP site, to the right of the fence line. The Martin Marietta gravel mine was the first incursion on this mighty tributary. Neighbors and Kerr County residents objected but the Kerr County Comm. Court approved MM's permit to put a gravel mine in the center of the Nowlin's Hollow waterway. The USACE should never have allowed this to happen: They were notified and petitioned but they did nothing.

