

Member Organizations

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 Center for Conservation
 Citizens for the Protection of Cibolo Creek
 Comal County Conservation Alliance
 Environment Texas
 First Universalist Unitarian Church of SA
 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
 Hill Country Alliance
 Kendall County Well Owners Association
 Kinney County Ground Zero
 Leon Springs Business Association
 Native Plant Society of Texas – SA
 Northwest Interstate Coalition of Neighborhoods
 Pedernales River Alliance – Gillespie Co.
 Preserve Castroville
 Preserve Lake Dunlop Association
 Preserve Our Hill Country Environment
 RiverAid San Antonio
 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 Area Alliance
 Sisters of the Divine Providence
 Solar San Antonio
 Texas Cave Management Association
 Trinity Edwards Spring Protection Assoc.
 Water Aid – Texas State University
 Wildlife Rescue & Rehabilitation
 Wimberley Valley Watershed Association

January 14, 2026

City of San Antonio- Planning Commission
 Development and Business Services Center
 1901 South Alamo
 San Antonio, TX 78204

Submitted in writing before 4 PM the day before the January 16 Planning Commission Special Meeting to Case Manager Priscilla Rosales-Piña - Priscilla.Rosales-Pina@sanantonio.gov

Re: Written Comments for Agenda Item #01: 26-211905

Please accept the attached comments on behalf of the sixty-three member groups of the Greater Edwards Aquifer Alliance

1. Background. A public hearing and resolution regarding the request for the City of San Antonio's consent to the creation by the Texas Commission on Environment Quality (TCEQ) of a Municipal Utility District (MUD) to be named the Bexar County MUD No. 2, generally located northwest of the intersection of Scenic Loop and Babcock Road in the extraterritorial jurisdiction of the City of San Antonio, Bexar County and associated Development Agreement between the City of San Antonio and the Owners, Guajolote Ranch Inc., and Sidney and Marcie Edwards.

2. Greater Edwards Aquifer Alliance (GEAA). GEAA submits the following comments on behalf of our sixteen Bexar County member organizations and sixty-three member organizations. GEAA is a 501(c)(3) nonprofit organization that promotes effective, broad-based advocacy for the protection and preservation of the Edwards and Trinity Aquifers, their springs, watersheds, and the Texas Hill Country that sustains them. GEAA and its members' specific areas of concern are summarized in the following section of this letter.

3. Comments on the zoning case. As noted in the January 16 Planning Commission Special Meeting Agenda, Case Number 26-211905 is generally located northwest of the intersection of Scenic Loop and Babcock Road in the extraterritorial jurisdiction of the City of San Antonio, Bexar County. For this case, a public hearing and resolution is being considered regarding the request for the City of San Antonio's (City) consent to the creation of the proposed Bexar County Municipal Utility District No. 2 (District) by the Texas Commission on Environmental Quality (TCEQ), in the City's extraterritorial jurisdiction (ETJ), and associated Development Agreement between the City and the Landowners, Guajolote Ranch Inc., and Sidney and Marcie Edwards.

A Municipal Utility District (MUD) is a limited-purpose government district used as a financing tool for the provision of municipal utility services to development located outside of a city's corporate boundary, typically within the city's ETJ. Once established, a MUD may issue bonds to fund water, wastewater, drainage, electrical services, roads, or other infrastructure and services within its boundary. MUDs may be created through the approval by TCEQ or by the Texas legislature.

GEAA urges the Planning Commission to deny the applicants' request for the creation of a Bexar County MUD No. 2 (Guajolote Ranch Municipal MUD). GEAA has twice contacted the applicants for the creation of this MUD, who currently own the property, to inform them that the City of San Antonio (City) was interested in discussing the purchase of a conservation easement through San Antonio's Edwards Aquifer Protection Program. As far as we know, they refused to consider this option, which could have provided a lucrative and more environmentally protective alternative to selling the property to Lennar.

We therefore request that you vote to deny this application for a MUD for the Guajolote Ranch for the following reasons:

- 1) The site of the Guajolote Ranch is currently designated in San Antonio's official North Sector Plan as "country," suitable for properties 10 acres or larger. Lennar's proposal is too dense to comply with the plan. A development of this density, besides being totally inconsistent with current land uses, poses a real threat to San Antonio's water supplies and to the well-being of nearby neighbors.
- 2) We note that the development plan for the MUD has an impervious cover limit of 30%. Given the importance of this site in recharging the Edwards and Trinity aquifers, we believe that a 15% impervious cover limit is more appropriate. A 2020 study, "Causal Effect of Impervious Cover on Annual Flood Magnitude for the United States", found that for every 1% increase in the area of impervious cover, the annual flood magnitude in nearby waterways increases by 3.3%. This is especially true in karst landscapes such as the Edwards Aquifer Contributing Zone.
- 3) We believe that the City could have negotiated better terms in the settlement agreement between San Antonio Metro Health and Lennar. The terms negotiated are substantively the same as the requirements that San Antonio Water Systems (SAWS) insisted on as conditions of the water utility service agreement with Lennar. SAWS and the City should have required Lennar to pay for post development water quality testing of private wells that might be at risk from waste and stormwater contamination. The settlement negotiations also provided an opportunity to insist on detailed assurances for adequate stormwater management plans. Non-point source pollution from the development is an issue that should have been addressed.
- 4) The language of the concessions outlined in the Lennar- San Antonio Metro Health agreement is vague, lacking enforceable definitions, measurable thresholds, or operational requirements. As a result, Lennar faces no clear obligations to fulfill the intent of the concessions. If this MUD is approved and the project proceeds, the City would need to constantly monitor all aspects of the project to ensure Lennar's compliance with the terms negotiated in the City Metro Health agreement.
- 5) In 2020, GEAA received a \$175,000 settlement from Lennar and its contractors, including Pape-Dawson Engineers, for violating a negotiated settlement agreement with GEAA and for violating the Clean Water Act at its 4-S Ranch subdivision. In October 2019, muddy water and construction debris from the 4S Ranch construction site flooded a downstream neighbor's property, causing over \$100,000 in damages. This damage was due to Lennar moving the site of the drainage outfall, as specified in the settlement agreement, to a location that caused this

flooding. Further, Lennar built a home on top of a recharge feature that was required to be preserved and buffered in the terms of the settlement agreement. It is our experience that the terms of negotiated settlement agreements are not scrupulously observed by Lennar.

- 6) While we agree that affordable housing is needed, we do not believe that the Guajolote Ranch development will provide homes that are affordable to most San Antonio families. Although the sales price of homes may be affordable, the additional property taxes to be assessed on homeowners in this MUD could equal or surpass the assessments collected by Bexar County. We further assert that there are plenty of sites in San Antonio where affordable housing could be built without threatening San Antonio's groundwater supplies.

Thank you for your attention to this important issue. Please consider GEAA as a resource that you can rely on for accurate information on water issues.

Sincerely,



Annalisa Peace
Executive Director
Greater Edwards Aquifer Alliance



Nathan Glavy
Technical Director
Greater Edwards Aquifer Alliance

¹ Sikorski, Juliet, and Cheyanne McDaniel. Greater Edwards Aquifer Alliance, San Antonio, TX, 2021, pp. 1–9, Amendments to the North Sector Plan.