

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

Cibola Center for Conservation

Citizens for the Protection of Cibola 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:

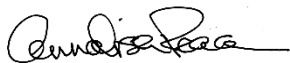
- 1) The site of the Guajolote Ranch is currently designated in San Antonio's official North Sector Plan as "country," suitable for properties 10 acres or larger. Lennar's proposal is too dense to comply with the plan. A development of this density, besides being totally inconsistent with current land 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.