

Dear Sirs:

Attached is an incident report covering events that occurred in and around Grey Forest, Texas June 13-15, 2026 as a result of receiving over four inches of rain in relatively short order. Helotes creek and tributaries of Helotes Creek, the most significant being Cates Creek which originates above the Altair neighborhood more than a mile north of Grey Forest, became swollen with precipitation and began flowing. Cates Creek flows across the Edwards property, a 63-acre parcel that comprises the main ingree/egress of the proposed Guajolote Ranch development. As the first photo below indicates, significant clearing, grading and earthworks are taking place on that property. As a result of clearing and bulldozing in the creek bed, as observed by EPA officials, we believe that significant silting, sedimentation, and turbidity to Cates and Helotes Creeks and possibly to the groundwater as well, may have occurred as a result of the ongoing work on this property.

We know the TCEQ is currently administering this property under the auspices of the Edwards Aquifer Protection Program under a Contributing Zone Plan (CZP,). As such, stormwater, runoff, silting, sedimentation, turbidity and Best Management Practices are a major TCEQ concern. We respectfully ask that you review the attached incident report and photos and other documentation and initiate an investigation into this serious matter. Because Bexar County Public Works is the primary issuer of permits on this site we respectfully inquire under what authority the county is able to waive Best Management Practices (BMPs) when the project is operating under the auspices of the TCEQ's Edwards Aquifer Protection Program and a Contributing Zone Plan? Isn't the TCEQ the only agency with the power to waive BMPs? And doesn't the fact that the county engineer waived BMPs make the clearing permit he issued void? Also, we note that on one of the enclosed stormwater permits it explicitly states that Lennar is to seek the approval of the Bexar County Fire Marshal before proceeding with work on the project. In speaking with the Fire Marshall 's office, they claim to have never been consulted regarding permits or plans and have not been involved in the Guajolote development. If that is the case, is that permit also defective? And if these permits for clearing are not technically valid and clearing and grading of the land has occurred, and it has, what are the implications and who is responsible?

In the meantime, stormwater is obviously an issue, and multiple violations exist on this site. We request that Bexar County or Bexar County in conjunction with TPWD, the EAA, or the TCEQ thoroughly investigates the pollution of the Edwards and Trinity Aquifers through stormwater runoff from this site and take appropriate action, remediations, fines etc. to bring the work into compliance and protect the drinking water of the 2.5 million Central Texans in eight counties who rely on the Edwards Aquifer for clean, pure drinking water. A Stop Work order seems appropriate until the situation can be reviewed and brought under control.

I stand ready to assist you in every way, have many more photos and additional information and would be happy to facilitate a site visits to neighborhood sites at your convenience.

Looking forward to your investigation and action, I am,

Respectfully,

Randy Neumann
Chair, Steering Committee
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