

September 26, 2025

Texas Commission on Environmental Quality Commissioners Paup, Janecka, and Gonzales 201 E 14th St #10 Austin, TX 78701

RE: Opposition to Wastewater Permit Application #WQ0016171001 (Guajolote Ranch)

Dear Commissioners:

This summer, the TCEQ will review wastewater permit application #WQ0016171001, submitted by Lennar Corporation for the proposed Guajolote Ranch development in Northwest Bexar County.

This project spans 1,100 acres and proposes 2,900 new homes, along with the discharge of up to 1 million gallons per day of treated wastewater into the Helotes Creek watershed. This watershed directly recharges the Trinity Aquifer and contributes approximately 15% of the total recharge to the Edwards Aquifer—an essential water source for 1.7 million Texans across 13 counties in South and Central Texas.

Approval of this permit would pose a serious risk to the quality of our primary drinking water supply.

The only in-depth study on the effects of discharging wastewater into this specific watershed was conducted by the Southwest Research Institute, funded by the City of San Antonio's Edwards Aquifer Protection Plan. The findings were clear: releasing treated effluent from residential development into the Helotes Creek watershed would "significantly degrade the watershed and the quality of water recharging the Edwards Aquifer."

This region's unique and fragile karst geology—including faults, sinkholes, and caves—allows for rapid surface-to-groundwater infiltration. As a result, even highly treated wastewater poses a real threat to groundwater quality. Any deviation from optimal treatment could introduce pharmaceuticals, pathogens, or other contaminants into the aquifer.

This permit risks irreversible harm to Helotes Creek, a cherished local waterway, and jeopardizes two of Texas' most important and sensitive aquifers—the Trinity and Edwards. Millions of residents depend on these aquifers for clean drinking water. As our population continues to grow, we must prioritize the protection of these irreplaceable natural resources.

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COMMITTEES:

LOCAL GOVERNMENT

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WATER, AGRICULTURE & RURAL AFFAIRS

We want to be clear: we do not oppose growth or development. However, we strongly oppose this particular wastewater treatment proposal because of its location and the unacceptable risks it presents. Once contaminated, these water sources cannot be restored.

We respectfully urge you to deny Permit #WQ0016171001. The long-term risks to public health and environmental integrity far outweigh any short-term benefits of this development.

Sincerely,

Roland Gutierrez State Senator, SD 19 José Menéndez Sate Senator, SD 26

Sarah Eckhardt State Senator, SD 14