

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 ingress/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 creekbed, 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. As such, stormwater, runoff, silting, sedimentation, turbidity and Best Management Practices are a major TCEQ concern. But we also know that Texas Parks and Wildlife has responsibility for public waterways in the state. Since 1929, residents of the Scenic Loop Playground, later incorporated as the City of Grey Forest, have been recreating in the waters of Helotes Creek. There are two natural rock swimming holes fed by springs, one featuring WPA era rock bath houses. Farther downstream is a fishing and boating lake impounded by the Theodore Roosevelt dam. Bass fishing is a favorite pastime of residents and the forerunner of the TPWD actually stocked this impoundment several times through the years.

You may be aware that the TCEQ has issued a wastewater permit to an agent of Lennar Homes of Texas who intends to construct a 3,000 home subdivision directly atop the Balcones Fault Zone in one of the most karst-ridden, sensitive environmental locations within the entire state. This plant is approved to release 1,000,000 gallons of sewer effluent daily and up to 4,000,000 gallons in a 24 hour period to Helotes Creek, a losing stream that feeds the Edwards Aquifer, the drinking water source for 2.5 million Texans in eight counties. A 2003 USGS Report, sponsored by the San Antonio Water System underscored the vulnerability of this area to groundwater contamination. Seventeen years later, the City of San Antonio hired Southwest Research Institute to study the Helotes Creek watershed and their conclusion was that wastewater systems installed in Helotes Creek watershed, regardless of type, would degrade the water recharging the Edwards aquifer

We respectfully ask that you review the attached incident report and photos and other documentation and initiate an investigation into this serious matter.

Both Cates Creek and Helotes creek which is known to be a losing stream that recharges the Edwards Aquifer. The area is atop the Balcones Fault Zone which contains over 200 mapped faults a number of which function as controlled conduits to the aquifer. Of greatest concern is the last photo enclosed in which we compare the usual spring flow at the Grey Forest swimming hole to the June 15 picture of that same spring which for the first time in memory reflects the same turbidity of the flooding stream itself. This could indicate a direct impact on groundwater which has been foretold by numerous hydrogeologists and portends great danger if the Guajolote wastewater plant permit allows them to release one million gallons of sewer effluent into Helotes Creek every single day. This will bring to an abrupt

halt the 97 years of swimming in the neighborhood pool and will either directly kill the fish in the fishing lake or through algal blooms they will likely die of hypoxia. So much for a Texan's Right to Fish.

I would encourage you to review especially the last photo in the enclosed exhibits which is a side-by-side comparison of the spring that feeds the natural swimming hole in grey Forest. Even in flooding conditions when the water can be less than clear due to flooding, the springs have ALWAYS run clear. This time even old timers say they have never seen the springs themselves resemble the milky water flowing in the flooding creek. This seems to support what hydrogeologists are telling us, that in a karst environment surface water goes to groundwater extremely rapidly. This is why residents are so worried about the volume of wastewater poised to be dumped in our losing stream and the impact it will have on our drinking wells. Everyone in the area, about 750 families, depend on wells for their drinking and household water.

We respectfully request that your agency initiates an investigation into this matter at your earliest convenience. We would also note that many area residents also reported an unusual odor associated with the milky colored floodwaters. Water samples were collected by neighbors at various points if you are interested.

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

Looking forward to your investigation, I am,

Respectfully,

Randy Neumann
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