

2/27/2018

Re: Air quality Permit # Vulcan Aggregate Operation, Comal County

I am speaking on behalf of the Greater Edwards Aquifer Alliance (GEAA). GEAA is a non-profit coalition of grassroots organizations across the Edwards Aquifer united to preserve the water, wildlife, scenic beauty, and cultural heritage of the Texas Hill Country.

Rock crushers have an enormous impact on the human and natural environment, not only through the effects of particulate matter (PM) on air quality and surrounding communities, but also to the health of the Edwards Aquifer and the water quality of Texas's groundwater and surface water resources. Millions of users depend on the Edwards Aquifer for drinking water and recreation, and several endangered species exist only in the aquifer. Any pollution caused by the aggregate industry will negatively affect downstream users and the endangered species. Mining of aquifer limestone, pollution and pumping of groundwater, effects on the wells of adjacent landowners, and added dust and traffic impacts from infrastructure and vehicles, are issues that go largely unaddressed under the current regulatory scheme.

I will not go further into the negative impacts of this project to the Edwards and Trinity aquifers because these considerations have no bearing on this permitting process. A Water Pollution Abatement Plan was mentioned but, that is largely irrelevant as the WPAP would only be submitted after this permit has been approved.

GEAA has been fighting with Vulcan and other aggregate producers since 2004. I have been coming to hearings like this for the past 15 years, where hundreds of people are protesting the negative impacts that quarry operations will have on their communities. And, since 2004 GEAA has been advocating the need for the State to require a process similar to NEPA to assess all environmental, cultural and historic impacts of the project. We ask that traffic impact studies be required, and that the quarry be required to pay for road upgrades to accommodate their operations. We ask that TCEQ examine the issue of water usage in quarrying operations, and perhaps, require implementation of waterless dust suppression technology.

We particularly request that TCEQ examine and address cumulative effects of adding this permit to the other permitted aggregate operations located in proximity to the site of this proposed permit. I recall attending a similar hearing regarding the permit of a Holcium operation here in Comal County several years ago. Like tonight, several hundred people showed up. And all the cars in that parking lot were covered with dust from existing quarries in the area. TCEQ approved that permit. They should not approve this one. In our opinion, the cumulative impacts on those who reside within this area provide adequate reason for denial of this permit.

GEAA will be going to the legislature in 2019 to request that nine counties in the Hill Country be granted limited land use authority, including the authority to prohibit incompatible land uses such as this one.

Thank you, Annalisa Peace, Executive Director, Greater Edwards Aquifer Alliance