



OPEN LETTER TO THE TEXAS LIEUTENANT GOVERNOR

June 21, 2024

Office of the Lieutenant Governor
PO Box 12068
Austin, Tx 78711

Re: TCEQ-EAPP Water Pollution Abatement Plan (WPAP) Permit #: 13001906

Dear Lt. Governor Dan Patrick,

Thank you for attending a public Town Hall on April 15, 2024, and subsequently writing a letter to the TCEQ's Chairman about the proposed 600-acre, Black Mountain Cement production plant and limestone quarry in Grayson County. It is very important for the Texas legislature to make sure that the public's best interest is considered when the TCEQ approves any major permit that will have a profound impact on citizen's water, air, and quality of life.

The TCEQ is currently reviewing a Water Pollution Abatement Plan (WPAP) application submitted by Vulcan Construction Materials, LLC for a proposed 1,515-acre, limestone-aggregate quarry located in the middle of the environmentally sensitive, Edwards Aquifer recharge zone in central Comal County. The Edwards Aquifer Authority (EAA) recognizes that in this area the Edwards Aquifer and Trinity Aquifer are interconnected. Quarries use explosives composed of ammonium nitrate and diesel oil. Studies have shown that up to 28% of the explosive material remains unburned and easily leaches nitrate into underlying aquifers.

The Texas Water Company, a major retail public utility serving over 84,000 people, sent a Public Comment to the TCEQ on April 22, 2024, requesting a Public Meeting with the experts from the TCEQ-EAPP and Vulcan to make sure that groundwater will be protected. Senator Donna Campbell and State Representative Carrie Isaac sent a joint letter requesting a Public Meeting, as did over 780 concerned individuals and citizen groups like Preserve our Hill Country Environment (PHCE), Greater Edwards Aquifer Alliance (GEAA), Texans for Responsible Aggregate Mining (TRAM), Groundwater Research & Education Aquifer Team (GREAT), and Hill Country Alliance (HCA). The TCEQ's Executive Director Kelly Keel has responded by saying that statutes and rules governing a WPAP do not include an opportunity for a public meeting. Why not? Public Meetings are regularly held for other water-related permits like TLAP and TPDES.

A large number of Comal County residents are concerned about the Vulcan project's long-term impact on their water quality and quantity. Putting a major quarry in the middle of a rapidly expanding suburban environment will not only put the residents' health at risk, but it will also lead to a significant decrease in the property values and the tax base. Comal County is proud to be known as the gateway to the Hill Country, and its tourism industry, which is based on water-related activities, generated over \$1.1 billion in revenue according to a 2022 Greater New Braunfels Chamber of Commerce's Convention and Visitor's Bureau report.

Furthermore, groundwater from the Edwards and Trinity aquifers provides water to well over 2.5 million Texans.

Please ask the TCEQ to hold a Public Meeting before a water permit for the Vulcan Comal Quarry is issued. The Pape-Dawson analysis submitted by Vulcan does not sufficiently demonstrate that the quarry operations will not pose a significant risk to the underlying aquifers. The people of New Braunfels and surrounding areas deserve an opportunity to meet with the experts at TCEQ and Vulcan. Input from the experts from the Edwards Aquifer Authority would also be very welcome.

Respectfully submitted,
Milann Guckian



Milann Guckian, President

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www.preserveourhillcountry.org

<https://www.stop3009vulcanquarry.com/>



Enclosures (3):

GDHM Attorneys at Law – Public Comment on behalf Texas Water Company

Perales, Allmon, & Ice, P.C. – Public Comment on behalf of Preserve our Hill Country Environment

Brian A. Smith, Ph.D – Report on Hydrogeology of the Edwards & Trinity Aquifers re: Vulcan Comal Quarry