

Bill Alsup

City of Richardson
2360 Campbell Creek Blvd. STE 525
Richardson, TX 75082
October 27, 2025

Chairman and Commissioners
Texas Commission on Environmental Quality
12100 Park 35 Circle
Austin, TX 78753

Re: Support for Rule Project No. 2025-032-116-AI – Implementation of Senate Bill 763 & Senate Bill 2351 (Concrete Batch Plant Standard Permit Amendments)

Dear Chairman and Commissioners:

On behalf of the City of Richardson (the “City”), I write to express our strong support for the proposed rulemaking under Rule Project No. 2025-032-116-AI, which implements Senate Bill 763 and Senate Bill 2351, relating to standard permits for permanent concrete batch plants.

Background and Local Impacts

The City is committed to safeguarding public health, protecting residential and community air quality, and ensuring responsible industrial development. Concrete batch plants, particularly those authorized under standard permits for permanent wet batching, dry batching or central-mixing operations, present distinct challenges for nearby municipalities due to emissions of particulate matter, additional truck traffic, noise, and other environmental and community impacts. The legislative changes in SB 763 and SB 2351 respond to growing concerns about whether the existing standard permit framework remains sufficiently protective and whether the authorization process appropriately accounts for delays, expansions or modifications of permitted plants.

Why the City Supports the Proposed Rulemaking

1. **Regular Protectiveness Reviews (SB 763):** The requirement that the TCEQ conduct a “protectiveness review” at least once every eight years (for the standard permit covering permanent concrete batch plants) helps ensure that the permit remains aligned with current science, air quality conditions, and health outcomes. From a municipal perspective, this ensures that permit conditions do not become stale and that nearby residents remain protected from emerging risks.
2. **Updated Authorization Requirements (SB 2351):** The addition of provisions allowing the TCEQ to require operators who have not begun construction under an older standard permit to comply with an amended permit when they request an extension ensures that facilities do not indefinitely delay construction under outdated standards. This helps



RICHARDSON, TX

HEALTH

Richardson Health Department
P.O. Box 830309
Richardson, TX
75083-0309

972-744-4080
972-744-5802 fax

communities avoid being locked into less protective permit regimes simply because construction was delayed.

3. **Transparency through Application Requirements:** SB 763 also amends the Health & Safety Code to require that applications for authorizations under the standard permit include a plot plan showing property lines, emission sources, buildings, equipment layout, benchmarks, and setbacks or buffers. This gives municipalities better visibility into proposed plant layout relative to residential areas, schools, parks, and other sensitive sites, thereby supporting local land-use compatibility and public engagement.
4. **Municipal and Community Confidence:** By strengthening the permit review framework and aligning permit amendments with the most up-to-date permit conditions, the City gains greater confidence that industrial operations will meet modern environmental expectations — a key factor in local planning, zoning, and infrastructure investment.

Conclusion

The City of Richardson commends the TCEQ for advancing the rulemaking under Project 2025-032-116-AI and supports its adoption. The changes mandated by SB 763 and SB 2351 reflect a balanced approach that preserves the essential role that concrete batch plants play in the state's infrastructure and construction economy, while ensuring that air quality protections, land-use compatibility, and community health remain at the forefront. We believe this rulemaking will help align permit oversight with modern environmental expectations and strengthen local government-state coordination.

Thank you for your consideration. The City looks forward to continuing to work with you to implement these rule changes in a manner that advances both economic development and community health.

Sincerely,

Bill Alsup
Director of Health
City of Richardson

972-744-4079
bill.alsup@cor.gov