



**Kerr County Commissioner, Precinct 2**

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**Kerrville, Texas**

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January 24, 2025

Texas Commission on Environmental Quality

Jess Robinson, MC 175

Office of Legal Services

P.O. Box 13087, Austin, TX 78711-3087

**RE: APO BMP List Proposal**

Dear Ms. Robinson,

I am writing to you on behalf of the Kerr County Aggregate Production Operations Community Advisory Council in response to TCEQ's request for comments on their proposed list of Best Management Practices for the Aggregate Production Operations Industry in Texas. Unfortunately, due to adverse weather last Tuesday when our Advisory Council had planned to meet and discuss this response, our meeting had to be postponed and we have not had the opportunity to collectively agree on a response. The only input received thus far was from Mr. Cliff Kaplan with the Hill Country Alliance and from Frances Lovett, one of our council members. I believe that the Hill Country Alliance and Frances Lovett have already provided you with their input separately.

The following are my observations. In general, the TCEQ proposed list of Best Management Practices for the Aggregate Production Operations Industry in Texas is both sparse and vague with a few reminders for operators to comply with their permit requirements. We recommend that you better address the issues of water use, noise, and light pollution with specific recommendations where possible. Reclamation should also be part of your BMPs. The Kerr County Voluntary Guidance Document for Aggregate Production Operations includes sections on:

- A. Surface Water Quality,
- B. Water Consumption,
- C. Adjacent Roadway Conditions,
- D. Air Quality,
- E. Noise,
- F. Lighting,
- G. Reclamation,
- H. Quality of Life, and
- I. Other Best Practices.

Rather than attempt to re-write your Best Management Practices, I simply urge you to adopt the attached Kerr County approved Voluntary Guidance Document for Aggregate Production Operations, or use as much of it as you can. Our APO Community Advisory Council collectively prepared, reviewed and approved these best management practices and our Aggregate Production Operators are making solid efforts to meet or exceed our voluntary guidance and we regularly review progress and issues in our quarterly meetings. As a result, feedback from both aggregate operators and members of the community has been very positive.

Sincerely,

A handwritten signature in black ink, appearing to read 'Rich Paces', written in a cursive style.

Rich Paces

Kerr County Commissioner, Precinct 2, and

Chairman of the Kerr County Aggregate Production Operations Community Advisory Council

Attachment

Kerr County approved Voluntary Guidance Document for Aggregate Production Operations