Mark Ferrero

SUBJECT: APO BMP List Proposal – Reduce Flooding Opportunities/New Options/Watersheds)

TCEQ's proposed list of Best Management Practices for Aggregate Production Operations completely ignores mining issues that contribute to flooding in the Houston area. Should or has a "root cause analysis" been performed by all subject matter experts to pin point all the flooding attributes of Lake Houston tributaries? This would allow once and for all a true plan to establish steps to eliminate (or at least minimize) unnecessary flooding and not create another repetitive expenditure to throw money at it as a band aid solution. The following items are to be placed higher on the radar of team.

• Most mines on the East and West Forks of the San Jacinto were inundated last year in what amounted to 2- to 10-year rainfall. Floodwaters swept industrial waste downstream into Lake Houston, the drinking water supply for two million people.

• The rivers also broke through the dikes of at least six of those mines. The rivers now run through pits instead of around them. This flushes sand and sediment downstream, where it reduces conveyance, supersedes any money spent on dredging efforts, blocks drainage and contributes to more flooding than ever before.

• It has been recommended doubling the minimum setback from 100 to 200 feet for mines in the San Jacinto watershed. That will put the mines on higher ground, farther from the floodway.

• It has been recommended also leaving forests undisturbed in the widened buffer zone. That will reduce the velocity of floodwater travel and, with it, the volume of sediment carried downstream. It will also decrease the likelihood of pit capture, by increasing the amount of time that it takes a river to migrate into a mine. The forest will also help capture sediment and possibly prevent an escape from a mine.

• The wider buffers will give rivers more room to spread out during floods. Right now, dikes are supposed to protect mines from a 100-year flood, but we have received more rain than any 100-year flood as it has been closer to 500-year levels. When mines build tall dikes on one side of a river, they double the volume of water flooding the other side. Then when they build tall dikes on both sides of a river, water has no room to spread out without invading the mines. The tall dikes effectively eliminate ALL floodplains and turn rivers into erosive firehoses, taking up water capacity in the river channel, hence more flooding.

• Has a "root cause analysis" been performed by all subject matter experts? Was a water sheds or retention/detention ponds reviews between Conroe and Lake Houston been configured for possible future flooding assistance?

• We should support the concerns and list of alternative BMPs proposed by Texans for Responsible Aggregate Mining.

Thank you for allowing our opinions to be expressed.