

Michael Cummings

I and my family are concerned that the proposed list of Best Management Practices for Aggregate Production Operations is grossly inadequate. For starters, they do not address practices to minimize water consumption, noise, and light pollution, as was directed to by the Texas Legislature. The BMPs for the areas they do address — dust and water storage — also warrant serious improvement.

Some of my concerns are tied to State water resource consumption for these operations, water quality degradation as a result of these operations and negative impact to our fast-disappearing dark night sky in so many rural areas of Texas. With the existing drought conditions that are pervasive across Texas, the amount of water required for such mining operations could have a disastrous impact on water tables and availability to many of our pristine and spring-fed creeks and rivers, such as the Sabinal, Frio and Nueces Rivers that remain a natural prize and source of life in many ways for Uvalde County. Also, if TCEQ does not include specific language and restrictions impacting the protection of our Texas Dark Skies, this incredible and unique feature in so many rural areas of Texas, such as Uvalde and Real Counties, will also be placed at grave risk for further and faster degradation than we have been witnessing over the past five to ten years.

I respectfully submit that TCEQ further develop their list of BMPs, making sure to thoroughly address all of the issues that the Legislature directed them to address.

Much obliged,

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