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TCEQ's attempt to create a helpful list of Best Management Practices for Aggregate Production Operations is an exercise in willful blindness. It completely ignores issues mandated by the legislature, as well as others that reduce water quality and increase flood risk.

The issues you do address are addressed in a vague and/or self-evident manner that render them inadequate.

In addition to more specificity, I would like to see BMPs that help mines in the Houston region avoid inundation and pit capture.

Most mines on the East and West Forks of the San Jacinto were inundated last year. 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, blocks drainage and contributes to flooding.

Addressing these issues requires building mines on higher ground, farther from rivers.

I recommend 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.

I also recommend leaving forests undisturbed in the widened buffer zone. That will reduce the velocity of floodwater 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 that may escape a mine.

Finally, the wider buffers will give rivers more room to spread out during floods. Right now, dikes are supposed to protect mines from a hundred-year flood. But when mines build tall dikes on one side of a river, they double the volume of water flooding the other side. And 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.

The attached PDF shows visual proof of the need for BMPs that address our main sand-mining concerns in the San Jacinto Watershed.

I also support the concerns and list of alternative BMPs supported by Texans for Responsible Aggregate Mining.